

### HVRP Quarterly Listening Session Questions and Answers

### Eligibility

- Q: When does Veterans' Program Letter (VPL) 02-23 take effect?
- A: VPL 02-23 was effective as of posting on February 10, 2023.

# Q: Why does one day in bootcamp count for Active Military, but the same does not apply to National Guard or Reserve members?

A: The determination is based on the definitions found in <u>38 U.S.C. § 101(2)</u>, (21), and (22). Basic training is considered "active duty for training." The definition of "active duty for training" pertains to the reserve component of the Armed Forces. Therefore, time spent in basic training by National Guard and Reserve members, as well as any other active or inactive duty for training, would not meet the definition of "veteran" per <u>38 U.S.C. § 101</u>.

### Q: Can grantees use the results of the U.S. Department of Veterans Affairs' (VA) Status Query and Response Exchange System (SQUARES) or Hospital Inquiry (HINQ) to determine HVRP eligibility?

A: HINQ and SQUARES documentation are acceptable as provisional source documents to expedite enrollment; however, a DD-214 (or the VA Summary of Benefits letter for National Guard and Reserve members with a service-connected disability who were not issued a DD-214 as they may not have served on active duty) must be requested within three business days of enrollment and must be included in the participant case file prior to the participant exiting the program. It is the grant recipient's responsibility to follow up on requests for DD-214s (or the VA Summary of Benefits letter, when appropriate). Failure to include this documentation in the participant case file may result in disallowed costs for these participants, and grant recipients must immediately remove these participants from the U.S. Department of Labor (DOL) performance reporting forms (i.e., Technical Performance Report [TPR]). In rare circumstances, if the grant recipient has requested the eligibility documentation within three business days of enrollment, followed up on the request, and made reasonable efforts to obtain the documentation, but does not receive the DD-214 by the time the participant exits, the grant recipient should reach out to their Grant Officer's Training Representative (GOTR) to discuss these situations when they arise.

# Q: Why can't grantees use the results of the SQUARES advanced search for documentation of eligibility instead of a DD-214?

A: The DD-214 (or the VA Summary of Benefits letter for National Guard and Reserve members with a service-connected disability who were not issued a DD-214, as they may not have served on active duty) is the official document to verify eligibility. HINQ and SQUARES documentation are acceptable as provisional source documents to expedite enrollment.



# Q: Is there a time limit when a grantee must remove a participant from the program if the DD-214 is not received in a timely manner?

- A: DD-214 requests should not be taking as long as they were previously. If a grantee is concerned about the length of time it is taking to receive a requested DD-214 for a participant, the grantee should reach out to their GOTR to discuss the situation. Per VPL 02-23, a DD-214 (or the VA Summary of Benefits letter, when appropriate) must be requested within three business days of enrollment and must be included in the participant case file prior to the participant exiting the program. Failure to do so may result in disallowed costs for these participants, and grant recipients must immediately remove these participants from the DOL performance reporting forms (i.e., TPR).
- Q: If a veteran was enrolled in HVRP and then placed into employment prior to the DD-214 coming in, does the grantee need to wait until the DD-214 comes in to count them as a placement? If so, would we then retroactively exit them to placement once the DD-214 comes in or would their placement date be considered the date that the DD-214 comes in?
- A: DD-214 requests should not be taking as long as they were previously. The date of exit for placement should reflect the true date of placement into unsubsidized employment. If a grantee has a situation where a DD-214 has been requested but not yet received for a participant being hired by an employer, the grantee should reach out to their GOTR to discuss the situation.

### Q: What should a grantee do if they have spent money on a provisionally enrolled participant but the DD-214 later shows the participant is ineligible for HVRP?

A: The grantee may be responsible for repaying any associated costs for an individual they enroll but later discover is not eligible for HVRP based on their DD-214. If a grantee suspects they may be in this situation, the grantee should reach out to their GOTR to discuss how to proceed.

#### Q: Are there best practices for getting DD-214s quickly?

**A:** These are some options:

- Go to the <u>National Archives Veterans' Service Records site</u>. Under "Start Request Online," select "DD 214/Separation Documents." Then, select "Make a new request." When you get to the section that asks, "Which of these categories best describes why you're requesting the records?", select "Emergency Request" and then "Homeless Seeking Shelter." Using this option, you will be required to verify that the individual you are seeking documentation for does meet their definition of homelessness before proceeding.
- Submit a military records request to get the DD-214 or other military service records through the milConnect website. See the VA's <u>instructions for navigating milConnect</u> for more information.
- Contact your state or county Veterans agency.

Per VPL 02-23, Attachment 2, other resources include:

- <u>eVetRecs Request Veterans Records Online Service Records Requests</u>
- SF-180 Request Pertaining to Military Records form download



#### Q: Which partner programs make an individual eligible for HVRP?

A: Veterans participating in the U.S. Department of Housing and Urban Development (HUD)-Veterans Affairs Supportive Housing (VASH), Tribal HUD-VASH, VA Supportive Services for Veteran Families (SSVF) programs, or veterans who are receiving assistance under the Native American Housing Assistance and Self Determination Act of 1996 (NAHASDA) (25 U.S.C. § 4101 *et seq.*) are eligible for HVRP. If the grantee has documentation from the partner program to support the veteran's homelessness or at-risk of homelessness status, the grantee does not need to collect additional documentation. Veteran status documentation, such as the DD-214, is still required. HINQ and SQUARES documentation are acceptable as provisional source documents to expedite enrollment.

# Q: Are individuals enrolled in the Grant and Per Diem (GPD) and HUD's Rapid Re-Housing (RRH) programs eligible for HVRP?

A: GPD is considered transitional housing; therefore, it meets the definition of homelessness under the HEARTH Act (<u>42 U.S.C. § 11302</u>). RRH rapidly connects families and individuals experiencing homelessness to permanent housing (and is not listed in 38 U.S.C. § 2021 as a partner program, such as VA SSVF) and, therefore, is not eligible for HVRP.

As a reminder, veterans are eligible for HVRP if they were experiencing homelessness but found housing during the 60-day period preceding the date on which the veteran began to participate in a program under this section.

- Q: Persons in SSVF, SSVF Shallow Subsidy, GPD HUD-VASH, and NAHASDA are classified as homeless. If someone has been receiving that assistance for 12 months or longer, would they be classified as "episodically homeless," as this is a critical HVRP category?
- A: If the program is considered "transitional housing," it meets the definition of homeless under the HEARTH Act (<u>42 U.S.C. § 11302</u>). The veteran experiencing homelessness would be considered "episodically homeless" if they meet the following definition from VPL 02-23, <u>Attachment 1</u>:

Episodically Homeless – An episodically homeless person is an individual who has been continuously homeless for one (1) year or more or has experienced at least four (4) episodes of homelessness in the last three (3) years with a combined length of time homeless of least 12 months. Please note that the definition of episodically homeless differs from the chronically homeless definition used by the Department of Housing and Urban Development, as the individual is not required to have a verified disability.

#### Q: Is there still a limit on the percentage of participants that can be at risk of homelessness?

A: There is no longer a limit on the percentage of HVRP participants served by a grant recipient who are at risk of homelessness. The number of enrollments that come from the "at risk of homelessness" category can vary depending on local circumstances. GOTRs will regularly monitor the report of homeless and "at risk of homelessness" participants to ensure enrollments reflect the needs of the grant recipient's service delivery area.



#### Q: When determining eligibility for at risk of homelessness, do all three criteria have to be met?

A: Yes. The individual or family must have income below 30 percent of median income for the geographic area; and have insufficient resources immediately available to attain housing stability; and meet one of the following conditions: have moved frequently because of economic reasons, or are living in the home of another because of economic hardship, or have been notified that their right to occupy their current housing or living situation will be terminated, or live in a hotel or motel, or live in severely overcrowded housing, or are exiting an institution, or otherwise live in housing that has characteristics associated with instability and an increased risk of homelessness.

### Q: Can VETS provide clarification for the "at risk of homelessness" criteria:

- A: The guidance found in VPL 02-23, <u>Attachment 1</u> for "at risk of homelessness" comes directly from statute, as stated in <u>42 U.S.C. § 11360</u>. To align with other federal entities and for further clarification on these criteria, please refer to <u>HUD's Criteria for Defining At Risk of Homelessness</u>, as defined below as an individual or family who:
  - (i) Has an annual income below 30% of median family income for the geographic area; AND
  - (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; AND
  - (iii) Meets one of the following conditions:
    - (A)Has moved because of economic reasons 2 or more times during the 60 days immediately preceding enrollment; **OR**
    - (B) Is living in the home of another because of economic hardship; OR
    - (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; **OR**
    - (D)Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; **OR**
    - (E) Lives in a Single Room Occupancy or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; **OR**
    - (F) Is exiting a publicly funded institution or system of care; OR
    - (G)Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.



#### Q: What categories must meet the "at risk of homelessness" criteria:

- A: The following two categories must meet the criteria for "at risk of homelessness":
  - 1. Veterans who, at program entry, are at risk of homelessness within 15–60 days (Note: Veterans who are within 14 days of homelessness are considered at "imminent risk" and are defined as homeless), and
  - 2. Veterans recently released (within the last 12 months) from incarceration who are at risk of homelessness.

# Q: Do some of the housing criteria under at risk of homelessness qualify a veteran as experiencing homelessness, such as living in the home of another because of economic hardship or living in a hotel or motel?

A: If the veteran meets the definition of homeless under the HEARTH Act, there is no requirement to meet the criteria of "at risk of homelessness."

### **Q:** Is the new income threshold for at risk of homelessness eligibility lower than the previous threshold?

A: <u>VPL 01-21</u> referred to the income requirements for "at risk of homelessness" as "low income." However, the guidance found in VPL 02-23, <u>Attachment 1</u> for the "at risk of homelessness" definition comes directly from statute, as stated in <u>42 U.S.C. § 11360</u>, and the median income requirement is "income below 30 percent of median income for the geographic area."

VPL 01-21 has been rescinded; therefore, the guidance within that VPL is no longer applicable. Grant recipients must adhere to the current guidance, <u>VPL 02-23</u> – <u>HVRP Participant Eligibility</u>, and attachments <u>1</u> and <u>2</u>.

- Q: The "at risk of homelessness" criteria require annual income below 30 percent of median family income for the geographic area. What is a geographic area?
- A: VETS defines a geographic area as the city or town in which the participant resides.

# Q: When determining whether a veteran meets the income threshold for at risk of homelessness eligibility, does the threshold adjust by family size or is it static?

A: It is static. Census data is the annual median household income regardless of family size. Grant recipients should use the "Median household income" data source from the <u>U.S. Census Bureau QuickFacts</u>, as referenced in <u>Attachment 1</u> of VPL 02-23. Note: The QuickFacts dashboard only displays statistics for cities and towns with a population of 5,000 or more. If you are unable to find the city or town in the dashboard, you can find it here: <u>Table S1903</u>, listed in the Median Income in the past 12 months (in 2021 inflation-adjusted dollars) table under Households.



See instructions below for details:

1. Go to <u>Table S1903</u> and select "Geos" in the ribbon below the table.

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Make sure "Margin of Error" is not highlighted				United States		
	in blue. If enabled, you may not see a median income for a city with a population <5000.			Number		
Label						Estimate

2. Enter the name of the city or town in the "Search Geography" field.

S1903 MEDIAN INCOME IN THE PAST 12 MONTHS (IN 2021 INFLATIO	)N
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3. Select the city/town. Once selected, click the X in the upper right corner of the window.

S1903 | MEDIAN INCOME IN THE PAST 12 MONTHS (IN 2021 INFLATION-ADJUSTED DOLLARS)



4. The first value listed in the Median Income column under the first "Households" row is the medium income for the city/town.

2021: ACS 5-Year Estimates Subject Tables V	LATION-ADJUSTED DOLLAR	5)		
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# Q: Can grant recipients use resources other than the U.S. Census Bureau link listed in Attachment 1 of the VPL?

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A: The U.S. Census Bureau is the official resource to determine median income for a geographic area. HVRP grant recipients may <u>not</u> use the HUD User <u>Income Limits</u> webpage to determine the 30 percent median income, as HUD's <u>methodology for determining median income</u> is not the most recent data available, and the <u>extremely low-income limits</u> computation includes other factors relevant to Section 8, such as setting the base-level calculation at 50 percent as opposed to 30 percent, fair market rent/housing adjustments, state non-metropolitan median income adjustments, and prior year cap/floor adjustments, that are not authorized under HVRP authorizing legislation, <u>38 U.S.C. §§ 2021, 2021A</u>, and <u>2023</u>.



- Q: The U.S. Census Bureau data is from 2021. Is there a way to include inflation as it pertains to the median income amounts?
- A: Grant recipients should use the <u>U.S. Census Bureau QuickFacts</u> to determine the median household income for the geographic area. Grant recipients may use the Bureau of Labor Statistics (BLS) <u>Consumer Price Index (CPI) Inflation Calculator</u> to adjust the income data to current dollars prior to the 30 percent calculation (see example below).
  - 1. Get median household income from the U.S. Census Bureau QuickFacts.



2. Go to the <u>BLS CPI Inflation Calculator</u> and complete steps 2–5.





The calculator provides the adjusted median household income in current dollars.



3. Calculate the HVRP at-risk income limit for the geographic area by multiplying the adjusted median household income (shown in step 6) by 30 percent.

Step	Geographic Area	Adjusted MHI Estimate (current dollars)	HVRP At-Risk Income Percentage	HVRP At-Risk Income Limit
7	Los Angeles city, CA	\$77,262.87	30%	\$77,262.87 * 30% = <b>\$23,178.86</b>

- Q: Do Supplemental Nutrition Assistance Program (SNAP) participants automatically meet the income threshold for at risk of homelessness eligibility?
- A: Not necessarily. Income thresholds for SNAP are set nationwide, whereas the income threshold for at risk of homelessness HVRP eligibility varies by geographic area.

# Q: If a veteran loses their job and has no income from the day they lose their job, would they be eligible for the income bracket? If so, would it begin the day they became unemployed? What documentation can be provided that indicates that a veteran has no income?

A: If a veteran is not employed, they may meet the criteria of being below the 30 percent median income. Annual income, as defined in 24 C.F.R. § 5.609, includes any income anticipated to be received from a source outside the family during the 12-month period following enrollment and amounts derived (during the 12-month period) from assets to which any member of the family has access. For the purposes of determining income for HVRP participants, VA disability compensation is not included as income. Grant recipients must conduct a comprehensive assessment to determine sufficient documentation, as a participant's situation may result in different types of documentation being relevant. Documentation for an individual who attests to being unemployed may include a termination notice, unemployment documentation, etc.



### Q: Are there additional resources for calculating and documenting income when determining eligibility for at risk of homelessness?

A: Annual income, as defined in <u>24 C.F.R. § 5.609</u>, includes any income anticipated to be received from a source outside the family during the 12-month period following enrollment and amounts derived (during the 12-month period) from assets to which any member of the family has access. Grant recipients should conduct a comprehensive assessment to determine sufficient documentation, as a participant's situation may result in different types of documentation being relevant. Documentation for an individual who attests to being unemployed may include a termination notice, unemployment documentation, etc. VETS and the National Veterans' Technical Assistance Center (NVTAC) will also be developing resources for grant recipients to use in determining and documenting income levels below 30 percent of median income for the geographic area.

#### Q: Can a grantee enroll veterans while they are incarcerated but about to be released?

- A: Grant recipients may serve an eligible veteran transitioning from incarceration who is scheduled to be released from incarceration within 12 months, if they meet the following definition per <u>38 U.S.C. § 2023</u>:
  - A veteran who is a resident of a penal institution, or an institution that provides long-term care for mental illness; and
  - Is at risk of homelessness absent referral and counseling services provided under the program.

Per VPL 02-23, Attachment 1, Veterans' Employment and Training Service (VETS) considers an "at risk" determination to involve factors deemed appropriate by the grant recipient; however, VETS does not permit grant recipients to determine that a veteran is "at risk" if the veteran is not scheduled to be released from incarceration within 12 months. Also, please note that the veterans transitioning from incarceration (scheduled to be released from incarceration within 12 months) do not need to meet the "at risk of homelessness" criteria defined in <u>42 U.S.C. § 11360</u>.

Another category eligible under HVRP are veterans that have been **released** from incarceration (within the last 12 months) who are considered at risk of homelessness. These participants **must** meet the "at risk of homelessness" criteria defined in <u>42 U.S.C. § 11360</u>.

#### **Funding Opportunity Announcement**

### Q: If a grantee is going into the third year of their HVRP grant, do they need to submit a proposal now for Program Year 2024?

A: No. The current Funding Opportunity Announcement is for grants beginning July 1, 2023 (Program Year 2023).



### Reporting

- Q: If an HVRP participant gets a job selling insurance that would generate money based on the sales of insurance, but they must pay for insurance training totaling \$400, is this a suitable employment outcome?
- A: If the employment placement is to unsubsidized employment, which it sounds like this is, then it would be a valid placement. However, the grantee may choose not to count the placement if that employment placement is not consistent with the goals of the participant. In order to be counted as a placement, the participant file must include the approved methods for documenting the placement (see Section I under "Documenting Placement/Long-Term Employment Outcomes" in <u>Attachment 1</u> of VPL 02-17), and it must be unsubsidized employment. A suitable employment outcome should consider the participant's employment goals and job-training plan to determine if the placement is a good-quality job that pays family-sustaining wages.
- Q: If the TPR and Technical Performance Narrative (TPN) are in on time and the GOTR requests a correction after the due date, are they still on time?
- A: The TPR and TPN must be accurate and timely. Therefore, the reports must be accurate when submitted by the due date. VETS recommends grant recipients submit reports to the GOTRs prior to the due date to ensure the report will be accurate upon submission on the due date. If grant recipients need to make any corrections directed by the GOTR, they must be completed in a timely manner.