

Homeless Veterans' Reintegration Program (HVRP) National Post-Award Conference (PAC) Frequently Asked Questions (FAQ) Day One: June 25, 2023

Funding Opportunity Announcement (FOA) 2023

1. *If a job requires cardiopulmonary resuscitation (CPR), is that considered training?*

Training opportunities, such as CPR, that enable a participant to **become employable or to seek a higher grade of employment** would be considered training. Grant recipients provide job-driven training that is targeted to the specific industries, occupations, and skills that are in demand locally. Training services can be provided in-house, through partners in the community, or through the local American Job Center (AJC). Please see the [Glossary of Terms](#) for the definitions of the different types of training a grant recipient may take credit for on the Technical Performance Report (TPR) (e.g., apprenticeship, career technical training, customized training, occupational skills training, etc.). Please note that training is considered a service and may only be provided while the participant is an active participant of the program. Please contact your Grant Officer's Technical Representative (GOTR) for specific questions regarding training.

2. *While buying property is not billable, is it fine to bill leased office space for staff?*

HVRP funds may be used to lease office space for staff in accordance with [2 Code of Federal Regulations \(C.F.R.\) §200.465](#). The grant recipient must determine if these costs are part of their indirect cost rate agreement or cost allocation plan and charge direct or indirect cost categories appropriately. If the office space is shared with another program, grant recipients must approximate using reasonable methods to ensure costs shared among the programs are proportionate. Grant recipients must follow direct cost allocation principles in accordance with [2 C.F.R., §200.405\(d\)](#) to ensure that costs are allocated to different funding sources proportionately to the benefit of those programs.

3. *Would you please clarify what types of training meet the grant requirements?*

Some examples of job training that may be provided to participants are on-the-job training (OJT), apprenticeships, customized job training, upgrading, retraining, or other work-based learning, and occupational skills training provided by the applicant or a third-party training provider. Life skills, financial management, resumé writing, interviewing preparation, and other job readiness or preparation services do not count towards the 80 percent job-training requirement. For example, current [Off-Base Transition Training \(OBTT\)](#) workshops are not considered training; however, the information provided in these workshops enhances case-management services to HVRP participants and can be counted as an employment service within the TPR. Employment and training programs must target in-demand occupations indicated in the Labor Market Information provided

in the Statement of Need. Please note that placement into an unsubsidized apprenticeship is considered placement into employment. Please see the [Glossary of Terms](#) for the definitions of the different types of training a grant recipient may take credit for on the TPR (e.g., apprenticeship, career technical training, customized training, occupational skills training, etc.).

4. *Has the TPR been updated so we can enter training dates within 90 days of exit?*

Program year (PY) 2023 TPR version 1.1 will revert the Service End Date back to a user-entered field. This means that the Training Last Provided and Service Last Provided dates will no longer auto-populate the Service End Date.

5. *Can you explain the 45-day limitation for childcare services?*

HVRP funds may be used to provide childcare services for participants that meet the definition of homeless veterans with children, in accordance with [38 United States Code \(U.S.C.\) §2021A](#), to expedite the reintegration of homeless women veterans and [homeless veterans](#) with children into the labor force. For the purposes of defining child or dependent, the U.S. Department of Labor, Veterans' Employment and Training Service (DOL-VETS) uses the definition of "child" according to [38 U.S.C. §101\(4\)\(A\)](#).

The use of grant funds for childcare services (allowable only to participants that meet the definition of a homeless veteran with children) is limited to 45 days, and the amount of assistance must be reasonable considering the average cost of childcare within the local community. Grant recipients that propose, in their budget narrative, to use funds for childcare services for these eligible participants must identify how they will exhaust other resources before identifying grant funds for this purpose. A grant recipient must provide proof of co-enrollment with the AJC and refer homeless veterans with children participants to AJC partners, such as the Temporary Assistance for Needy Families (TANF) program or other [federal benefit services](#), for childcare services. If a veteran with children can obtain funding for childcare services by any other means, such as through other federal or state programs, then HVRP grant funds cannot be used for such childcare costs. Grant recipients must have a standard operating procedure (SOP) in place to ensure this process is implemented and executed consistently and equitably.

6. *Can HVRP funds be used to pay for housing?*

Housing is a critical element for successful reintegration into the workforce. HVRP funds may be used for housing, but only for eligible participants who meet the definition of a veteran at risk of homelessness who is transitioning from certain institutions, in accordance with [38 U.S.C. §2023](#). This definition includes 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. DOL-VETS considers an "at risk" determination to involve factors deemed

appropriate by the grant recipient; however, DOL-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. HVRP recipients should promote equity in the pursuit for housing solutions for these eligible participants.

Grant recipients that propose, in their budget narrative, to use funds for housing assistance (an allowable cost only for recently released incarcerated veterans), must identify how they will exhaust other housing options such as those offered by penal institutions, community-based housing providers, or other housing assistance options before identifying grant funds for this purpose. The use of grant funds for housing assistance is limited to 90 days, and the amount of assistance must meet the test of rent reasonableness. To meet this test and to be able to pay a landlord up to 90 days of reasonable rent, the applicant must secure at least three (3) samples of rent for housing units located in the specific community and zip code of the desired housing that meet the needs of eligible, recently released incarcerated veterans. If a veteran recently released from incarceration can obtain housing by any other means, such as through other federal or state programs, then HVRP grant funds cannot be used for such housing assistance. Grant recipients must have an SOP in place to ensure this process is implemented and executed consistently and equitably.

Terms and Conditions, Incremental Funding, and Closeouts

1. Would building offices for case managers be considered construction costs?

Construction costs are not allowed. Minor alterations to adjust an existing space for grant activities (such as a classroom alteration) may be allowable [in accordance with 2 C.F.R. §462\(a\)](#). We do not consider this construction, and you must show the costs on other appropriate lines, such as Other or Contractual. Building an entire office would be considered construction costs and would not be allowed under HVRP.

2. Where can we find the new TPR?

On the DOL-VETS HVRP website under [HVRP Performance](#).

3. Are prepaid cell phones and minutes an allowable cost for participant needs or support costs?

It depends on a few different factors, such as whether the cell phone and minutes are necessary for the participant to overcome barriers and help the participant to obtain and maintain employment. All expenditures, including those identified in the most recently approved budget narrative, must be necessary, reasonable, allocable, and allowable in accordance with [2 C.F.R. §200.403](#). Grant recipients must attempt to leverage and exhaust all other resources prior to incurring the cost. All participant support costs must be applicable to assist the participant in overcoming barriers to employment, meaning

participant support costs must be connected to help participants obtain and maintain employment. All expenditures incurred by the grant must support the goals and objectives of the grant, and costs must be reasonable and necessary to the operation of the grant. Please contact your GOTR for technical assistance regarding costs and to determine if an amendment is required if you propose changes to your grant.

4. *In respect to the Incarcerated Veterans' Transition Program (IVTP) grant, can money be spent on qualifying veterans for housing?*

Per the Funding Opportunity Announcement (FOA), HVRP funds may be used for housing, but only for eligible participants who meet the definition of a veteran at risk of homelessness who is transitioning from certain institutions, in accordance with [38 U.S.C. §2023](#). This definition includes 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. DOL-VETS considers an "at risk" determination to involve factors deemed appropriate by the grant recipient; however, DOL-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. HVRP recipients should promote equity in the pursuit of housing solutions for these eligible participants.

Grant recipients that propose to use funds for housing assistance in their budget narrative (an allowable cost only for recently released incarcerated veterans) must identify how they will exhaust other housing options such as those offered by penal institutions, community-based housing providers, or other housing assistance options before identifying grant funds for this purpose. The use of grant funds for housing assistance is limited to 90 days, and the amount of assistance must meet the test of rent reasonableness. To meet this test and to be able to pay a landlord up to 90 days of reasonable rent, the applicant must secure at least three (3) samples of rent for housing units located in the specific community and zip code of the desired housing that meet the needs of eligible, recently released incarcerated veterans. If a veteran recently released from incarceration can obtain housing by any other means, such as through other federal or state programs, then HVRP grant funds cannot be used for such housing assistance. Grant recipients must have an SOP in place to ensure this process is implemented and executed consistently and equitably.

5. *Is the period of performance (PoP) the end of the fourth quarter (Q) of the third year of the grant or the end of the Q8 of the third year?*

The PoP ends at the end of the Q4 of the third year.

6. *Is this grant considered a reimbursable grant, or are all the funds available up front?*

The HVRP grant has a three-year PoP and is funded incrementally on an annual basis.

7. *How long does it usually take to get the budget amendment approved?*

A budget amendment is typically approved within 30 calendar days from the date of receipt, in accordance with [2 C.F.R. §200.308](#). However, there are several factors that play a role in the length of time it takes for an amendment to be approved, such as the complexity of the request, as well as completeness or accuracy of the request and required documentation/forms.

8. *When it comes to employment and verification, if we're not able to obtain a paystub during Q3 or Q4 from a veteran, are we no longer able to count that placement?*

According to the [TPR/Technical Performance Narrative \(TPN\) Desk Guide](#), the following sources of documentation to verify employment are acceptable:

- Automated employment database systems
- Contacts with employers
- Employer statement of earnings
- Family or business financial records
- Quarterly estimated tax for self-employed persons
- Unemployment insurance wage records
- Pay stubs

DOL-VETS does not categorically prohibit placements into self-employment. The participant must file a 1099 with the Internal Revenue Service (IRS) to report self-employment earnings. The participant must provide supporting documentation to the grant recipient as proof of self-employment and wages earned. This allows the grant recipient to determine hourly wages and other data elements required for reporting. For self-employment, case managers should consider requesting a business license, employer ID for services performed to, copies of income checks, receipts of job materials and equipment, wage records, 1099 MISC Form, and/or advertisement of services.

All data sources and methods used must be documented and are subject to audit.

Key Policies, Guidance, and Resources

1. *Can we give other trainings based on what the veteran needs or wants from our training plan?*

Grant recipients provide support services and trainings that aim to remove barriers to the full and equal participation of marginalized communities and through partnerships with a range of organizations that support the applicant's ability to reach out to and deliver equitable services to marginalized groups. Grant recipients should work with their assigned GOTRs regarding specific questions on services or trainings for participants.