



# **Homeless Veterans' Reintegration Program (HVRP) Post-Award Conference: Conditions of Award, Allowable and Unallowable Costs, Amendments**

**July 25, 2023**

# Today's Speaker



## Chris Brown

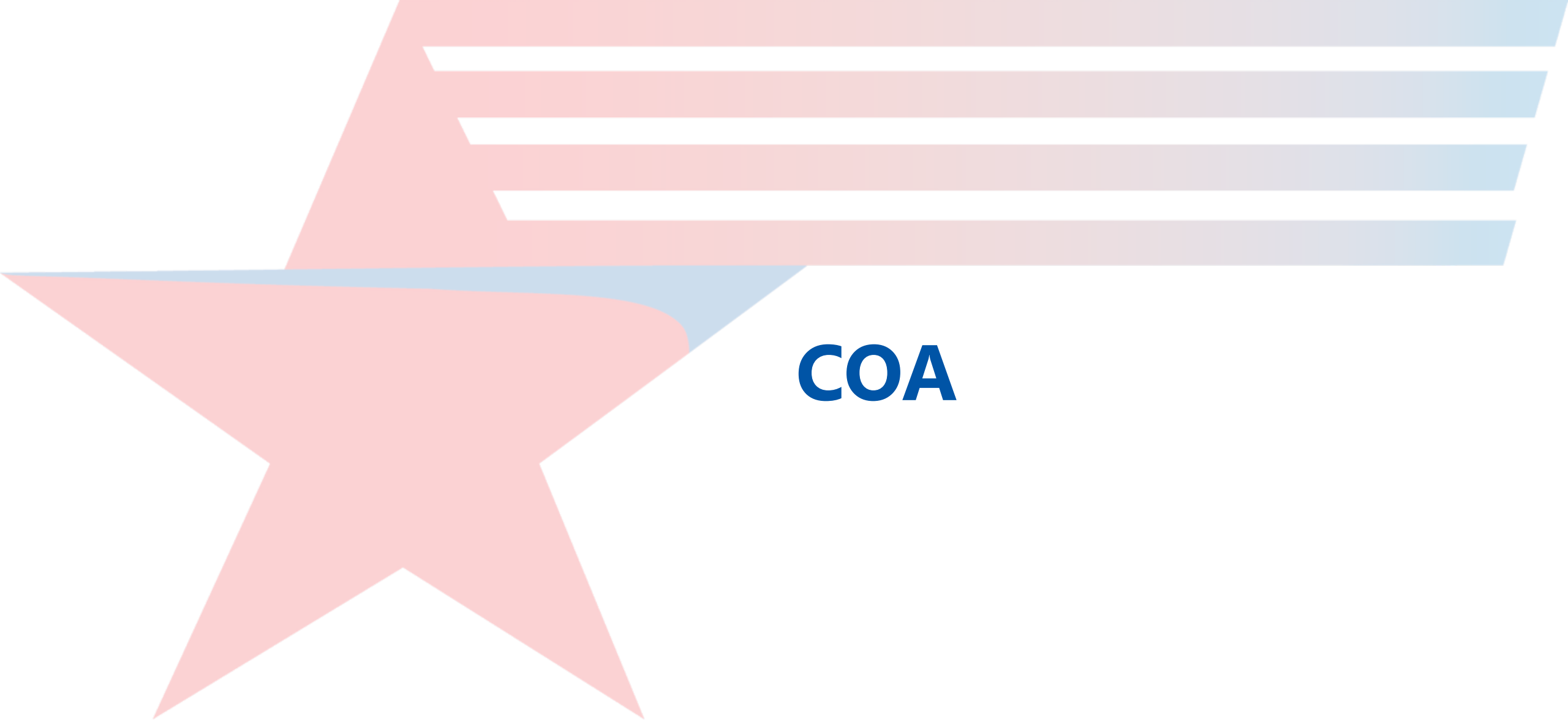
*HVRP Lead, Office of National Programs,  
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**U.S. Department of Labor-Veterans' Employment and  
Training Service (DOL-VETS)**



# Today's Session

- Conditions of Awards (COA)
- Allowable and Unallowable Costs
- Amendments



**COA**



# What is a COA?

- Accompanies initial or supplemental Notice of Award (NOA) as a supplemental narrative attachment.
- Sets forth requirements for the grant recipient directing them to take a specific action as a post-award requirement.
- Read the COA, follow up with your Grant Officer's Technical Representative (GOTR), and comply with the instructions.



# COA Instructions and Due Dates

- Not all conditions will require the submission of an amendment in GrantSolutions. Read your letter.
- Sets forth requirements for the grant recipient.
- **Grant recipients have 45 days to comply with the submission of an amendment in GrantSolutions or provide their GOTR with the specified documentation in the COA letter.**
- Indirect Cost COAs may have a greater period for submission based on the Terms and Conditions (T&C) and the COA. Failure to comply with having a Negotiated Indirect Cost Rate Agreement (NICRA) or a Cost Allocation Plan (CAP) may result in the repayment to DOL for any/all indirect charges incurred while operating with an expired NICRA or CAP.

# Specific Conditions Assigned to Awards (1 of 4)



- Grant recipients not meeting the conditions and timeline for submission run the risk of impacting their funding or additional conditions imposed.
- To reduce some common reasons for Grant-Officer-imposed conditions, please pay extra attention to the following areas:
  - Review the Budget Narrative and ensure you are checking for allowable/reasonable costs.
  - Ensure budget items are accounted for, are relayed clearly, and are allowable, and the figures in the Budget Narrative, the Standard Form (SF)-424A, and the SF-424 match and that the math is correct.
  - If your program uses the De Minimis rate, ensure your program is properly accounting for its Modified Total Direct Cost (MTDC).

# Specific Conditions Assigned to Awards (2 of 4)



- All First-Time HVRP Grant Recipient Organizations
- Grant award recipients must submit a copy of their organization's financial and administrative policies and procedures for the following internal control activities, which require written procedures. The included citations provide the specific criteria that must be addressed for each internal control:
  - Payments ([2 Code of Federal Regulations \[C.F.R.\] 200.302\(b\)\(6\)](#) and [2 C.F.R. 200.305](#));
  - Allowable costs ([2 C.F.R. 200.302\(b\)\(7\)](#) and [2 C.F.R. 200.403](#));
  - Procurement ([2 C.F.R. 200.318](#));
  - Competition ([2 C.F.R. 200.319](#));
  - Method for evaluation and selection ([2 C.F.R. 200.320](#));
  - Compensation - personal services and fringe benefits ([2 C.F.R. 200.430](#) and [2 C.F.R. 200.431](#));
  - Employee relocation costs ([2 C.F.R. 200.464](#)); and
  - Travel costs ([2 C.F.R. 200.475](#)).



## Specific Conditions Assigned to Awards (3 of 4)



- All First-Time HVRP Grant Recipient Organizations, submission of financial and administrative policies and procedures continued;
- Conditional approval to expend \$50,000 of award listed on NOA.
- Not authorized to incur costs above \$50,000 until the organizational financial and administrative policies and procedures are submitted, reviewed, and approved.
- A Full Notice to Proceed will be incorporated into your grant agreement as an official amendment, and all funds will be released upon meeting this condition.

## Specific Conditions Assigned to Awards (4 of 4)



- All Funding Opportunity Announcement (FOA) VETS-23-01 HVRP grant recipients that proposed to serve the same Service Delivery Areas (SDA) as a current grant recipient listed in FOA VETS-23-01 Attachment B:
  - VETS will compare the new recipient's proposed SDA and enrollment goals to the active grant(s) in the same area using VETS-23-01 Attachment B.
  - May result in an amendment to the proposed SDA(s) or an adjustment to enrollments for a specific SDA already served by another grant recipient.
  - Must work with GOTR to develop a course of action and determine whether or not an amendment is required.



# **Allowable and Unallowable Costs**



## An Allowable Cost Must:

- Be authorized under [2 C.F.R. Part 200 Subpart E](#) Cost Principles
- Be allocable to the award under the provisions of the applicable cost principles
- Necessary and reasonable for proper and efficient performance and administration of the grant or cooperative agreement



# An Allowable Cost (1 of 3)

- Be necessary and reasonable for the performance of the federal award. Performance for HVRP is established through the indicators listed in the FOA and are employment-based. Each individual HVRP program applied and has its own project design and budget.
- Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-federal entity
- Not be included as a cost or used to meet cost-sharing or matching requirements of any other federally-financed program in either the current or a prior period. (Does the grant recipient have [Supportive Services for Veterans Families \(SSVF\)](#), [Legal Services for Homeless Veterans and Veterans At-Risk for Homelessness Grants \(LSV-H\)](#), or state/local financial assistance for veterans?)

Reference: [Title 2 Code of Federal Regulations \(C.F.R.\) § 200.403 Factors affecting allowability of costs.](#)



## An Allowable Cost (2 of 3)

- Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity - **HVRP provides supportive services defined as services provided to support the reintegration of enrolled HVRP participants back into the labor force. Examples of support services include, but are not limited to, transportation, health care, financial assistance, drug and alcohol abuse counseling and referral, individual and family counseling, special services and materials for individuals with disabilities, job coaches, child care and dependent care (if eligible), temporary shelter (if eligible), financial counseling, and other reasonable expenses required for participation in the training program and may be provided in-kind or through partnerships.**

Reference: [Title 2 C.F.R. § 200.403 Factors affecting allowability of costs.](#)



## An Allowable Cost (3 of 3)

- Not be included as a cost or used to meet cost-sharing or matching requirements of any other federally-financed program in either the current or a prior period. Grant recipients must address the complex employment-related requirements and support services necessary to meet the needs of this population. This can be achieved either through direct services or through a robust referral system with established tools, resources, and partnerships to identify, recruit, prepare, and support veterans experiencing homelessness for employment success.

Reference: [Title 2 C.F.R. § 200.403 Factors affecting allowability of costs.](#)



## An Allocable Cost (1 of 2)

- A cost is allocable to a particular federal award or other cost objective if the goods or services involved are chargeable or assignable to that federal award or cost objective in accordance with relative benefits received. **If the project design includes training for 30 veterans to obtain a Commercial Driver's License (CDL), there must be an allocation in the budget for 30 veterans to attend training for CDL licenses.**

Reference: [Title 2 C.F.R. § 200.405 Allocable costs](#)





## An Allocable Cost (2 of 2)

- Any cost allocable to a particular federal award may not be charged to other federal awards to overcome fund deficiencies to avoid restrictions imposed by federal statutes, regulations, or terms and conditions of the federal awards or for other reasons. Refer to your budget narrative and FOA; **the budget narrative should provide a description of the leveraged resources provided to support grant activities, the specific activities they will cover, the way they will support HVRP goals, and the funding source.**

Reference: [Title 2 C.F.R. § 200.405 Allocable costs](#)



# A Reasonable Cost

- A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. Consider:
  - Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the non-federal entity or the proper and efficient performance of the federal award.
  - The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; federal, state, local, tribal, and other laws and regulations; and terms and conditions of the federal award.
  - Market prices for comparable goods or services for the geographic area.
  - Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the non-federal entity, its employees, where applicable, its students or membership, the public at large, and the federal government.
  - Whether the non-federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the federal award's cost.

Look at the barriers to employment and challenges facing the veteran experiencing homelessness and how the cost overcomes those barriers to lead to the grant recipient's overall employment-based performance. DOL-VETS does not allow the purchase of motor vehicles, buildings, or land.

Reference: [Title 2 C.F.R. § 200.404 Reasonable costs](#)

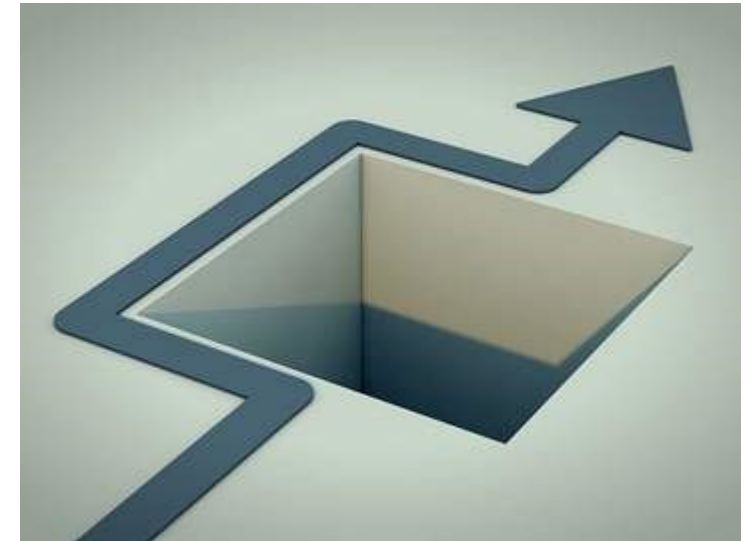
# Unallowable Costs

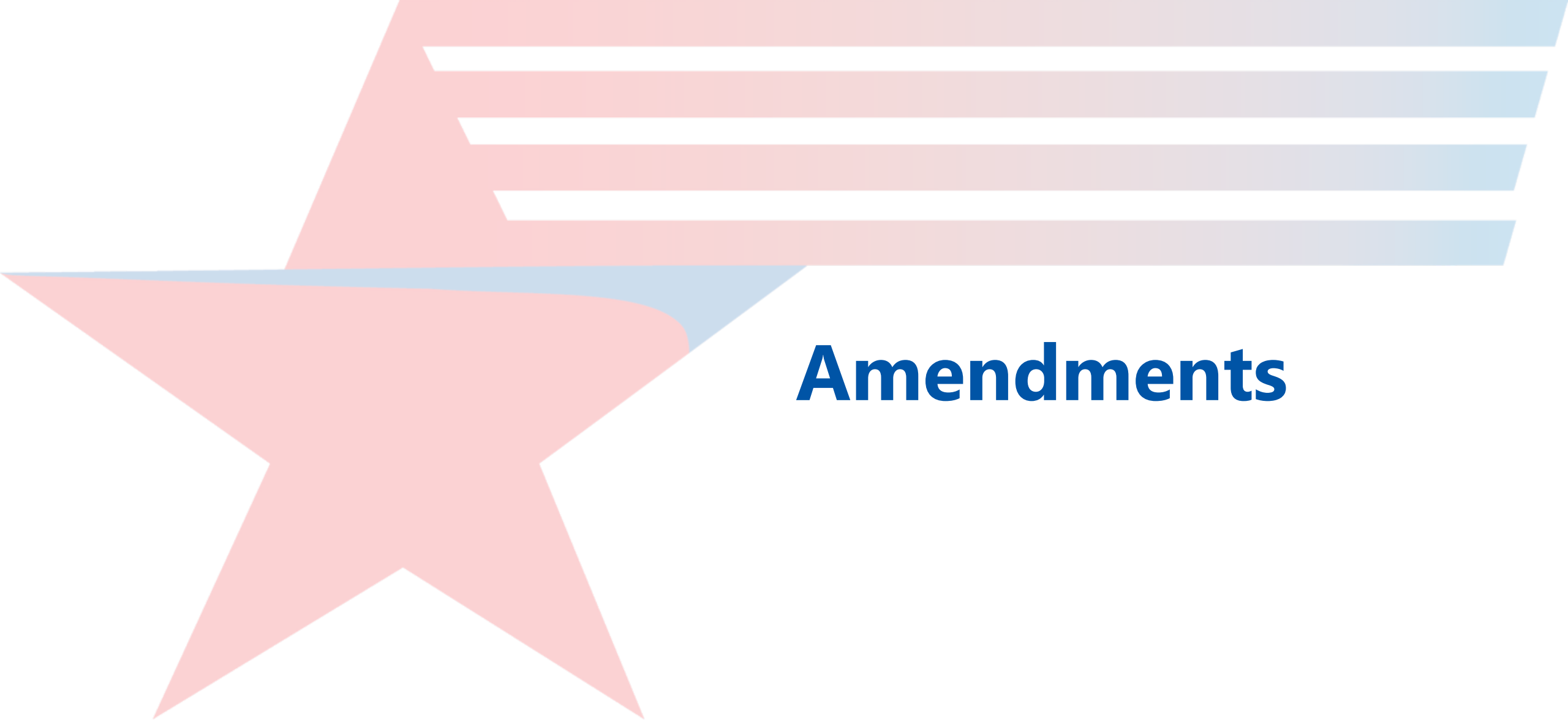
- **An allocable cost may not be allowable or reasonable**
  - Cost incurred for the award could not be authorized under Title 2 C.F.R. § 200 Subpart E but still meet the definition of allocable
- **Costs must be incurred for the award to which they are charged**
  - A HVRP program director spends 40 percent of their time working on Award A, 25 percent of their time working on Award B, and 35 percent of their time working on Project C. Therefore, 40 percent of their salary can be allocated to Award A, 25 percent to Award B, and 35 percent to Project C
  - **A cost must either benefit or be incurred specifically for that particular award.**



# Avoid Unallowable Costs

- **Ask:**
  - Is the item/service needed for HVRP?
  - Is the purchase included in the approved grant budget?
  - Does it exist elsewhere in our inventory? If so, can we use it for HVRP instead of buying another one?
  - Is there a less expensive alternative to purchase, e.g., leasing?
- **Direct or Indirect**
  - Does the cost result in a direct benefit to the HVRP?
  - Can it be easily and accurately traced to the HVRP?
  - Does it benefit more than one federal program?
  - Is it normally charged as indirect?
  - Does the cost have a proportional benefit to the HVRP?





# Amendments



# Amendments: What are They?

- Written approvals in the form of a NOA issued by the Grant Officer (GO) for any changes to the grant award that VETS requires prior approval in order to take effect
- Should be submitted in GrantSolutions at least 30 days prior to the proposed effective date.
- VETS applicable Active Policy on Requirements for amendments:
  - Veterans' Program Letter (VPL) 03-18 - Grant Modification Requests Due to Unanticipated Circumstances Resulting in Poor Performance
  - VPL 06-18, Ch. 1 – Grant Modification Process for Grants Awarded Under the HVRP
  - VPL 05-19 – Exception for the Provision of Emergency Services by HVRP Grantees Outside of Their Approved Service Delivery Area.
  - GO Memo 01-17 – Updated Information Regarding the NICRA, Modified Guidance Regarding Grant Modifications, and SF-425

# Amendments: What Requires an Amendment?



- Change to the scope of work
- Budget realignment of greater than 10 percent
- Change of critical personnel (the authorized representative or the point of contact)
- Administrative changes (change of organization name, address, Employer Identification Number [EIN])
- Incorporation of or change to a NICRA or CAP
- Purchase or lease of equipment of \$5,000 or more
- Period of performance extension

# Amendments: What's required to be submitted?



- Formal written request on organizational letterhead, addressed to the GO, and signed by the Authorized Representative that provides the grant number, describes the requested modification, and explains the reason for the request.
- If changing the total amount of funds awarded, a revised SF-424 signed by the Authorized Representative
- If the request involves a change to the grant budget, a revised SF-424A and a revised budget narrative
- If the request involves a change to the scope of work, a revised project narrative
- If the request involves a change to or incorporation of an indirect cost rate agreement or CAP, a copy of that agreement or plan (in addition to the other document required if the agreement or plan changes the budget)
- If the request involves a change to critical personnel, the name, title, phone number, email address, and fax number of the new Authorized Representative or point of contact



# Amendments: How Are They Submitted? (1 of 3)



- Via GrantSolutions following steps provided in the [GrantSolutions Grants Management Module \(GMM\) Grantee Guide](#)
- [Log in to Grantsolutions](#)

**My Grants List**

Show Closed Grants

All Grants (91)

Enter Grant # (you must enter the exact grant # to search)

<b>23555DV000055</b> → FAIN:23555DV000055 Active	<b>23555DV000057</b> → FAIN:23555DV000057 Active	<b>22555DV000048</b> → FAIN:22555DV000048 Active
PROJECT TITLE JVS Testing - directed announcement GRANT PROGRAM JVS Jobs for Veterans State Grants	PROJECT TITLE JVS Testing - directed announcement GRANT PROGRAM JVS Jobs for Veterans State Grants	PROJECT TITLE JVS Training Demo B GRANT PROGRAM JVS Jobs for Veterans State Grants
<b>23A60AP000007</b> → FAIN:23A60AP000007 Active	<b>23A60AP000003</b> → FAIN:23A60AP000003 Active	<b>23A60AP000004</b> → FAIN:23A60AP000004 Active

# Amendments: How Are They Submitted? (2 of 3)




10/01/2023 12/31/2024

**Current Budget Period:** 10/01/2023–09/30/2024 (1 of 1)

Details   History   Reports   **Amendments**   Notes

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**Coming Soon!**

We're continuously working on upgrading GrantSolutions experience. This feature is coming soon, but in the meantime you can view amendments for this grant in the classic experience.

[View Amendments](#)

# Amendments: How Are They Submitted? (3 of 3)



**Select Amendment Type**

Grant Number: [REDACTED]

Project Period: 09/30/2016 to 09/29/2021

Budget Period: 09/30/2018 to 09/29/2019

Amendment Type

- Balance of Funds (Type 6)
- Budget Revision (Type 6)
- Budget Revision (Type 3)
- Carryover Request (Type 6)
- Change Grantee Address (Type 6)
- Change in PI/PD (Type 6)
- Change in Grantee Authorizing Official (Type 6)
- Change in Scope (Type 6)
- EIN Change (Deobligate) (Type 6)
- EIN Change (Reobligate) (Type 6)
- Grant Closeout Action (Type 6)
- Mandatory Grant Project Extension (Type 6)
- NGA Revision (Type 6)
- Name change (Type 6)
- No Cost Extension (Type 6)
- Revision & Extension (Type 6)
- Supplement (Type 6)
- Supplement & Extension (Type 6)
- Supplement & Revision (Type 6)

# Amendments: When Will It Be Approved?



- Amendments should be submitted at least 30 days prior to the proposed effective date of the change.
- All amendments are proposals until approved by the GO.
- Approvals for amendments are via the issuance of an NOA
- Review NOA Item 30 Remarks as it relates to the details of the approval.
- **Your GOTR is not authorized to change any of the terms or conditions of the award or approve prior approval requests. Any changes to the terms or conditions or prior approvals must be approved by the GO.**



**Thank you!**