

2024 Homeless Veterans' Reintegration Program (HVRP) National Post-Award Conference (PAC) Day 2 Questions and Answers (Q&A)

Funding Opportunity Announcement (FOA) and Terms and Conditions

No questions.

GrantSolutions (GS) 101

Q: Is there a checklist to make sure we are not missing anything regarding registration from the Statistical Adjustment Model (SAM), GS, Veterans' Employment and Training Service (VETS) Grantee Reporting System (VGRS), etc.?

A: All continuing and new grant recipients should have received a welcome letter from their Grant Officer's Technical Representative (GOTR) that contains the necessary information grant recipients need to access the required systems. If you did receive a welcome letter, please contact your GOTR. Their name and contact information are listed on the first page of the Notice of Award (NoA) in Section 10 under "Program Official Contact Information." Additionally, newly awarded grant recipients are issued a congratulatory letter from the VETS' Grant Officer (GO). VETS will consider adding system registration information to the [National Veterans' Technical Assistance Center's \(NVTAC\) HVRP Grant Recipient Welcome Packet](#).

Q: Will the login for VGRS be the same as GS?

A: No, GS and VGRS are on different platforms; however, they both use [Login.gov](#) to authenticate user accounts. If you have an active Login.gov account for GS, that same account will give you access to VGRS once you have completed the initial registration process.

KPMG HVRP Audit Results Review and Debrief

Q: When is it expected for the de minimis rate to be increased to 15 percent? Can grant recipients update their de minimis to 15 percent now?

A: No, the 2024 revisions to [2 Code of Federal Regulations \(C.F.R.\) § 200](#) are effective for all federal awards issued on or after October 1, 2024.

Q: When the de minimis rate is increased, will an amendment submission be required?

A: Certain budget changes require amendments in accordance with [Veterans' Program Letter \(VPL\) 04-24](#). All active HVRP grants were issued awards prior to October 1, 2024; thus, all active grant recipients cannot charge greater than the de minimis rate of 10 percent.

Q: Is it necessary for proof of payment of an expense to include the charge in an invoice?

A: Grant recipients must have adequate documentation to support costs charged to their federal award. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, [2 C.F.R. 200 § 200.302\(a\)](#) and U.S. General Accountability Office (GAO) Standards for Internal Control in the Federal Government (GAO Standards), Design of Appropriate Documentation of Transaction, paragraph 10.03 require tracing of funds to a level of expenditure adequate to establish funds have been used according to federal statutes, regulations, and the terms and conditions of the federal award. Further, they should be readily available for examination. The HVRP Terms and Conditions require that the grant recipient must be able to provide documentation for all direct and indirect costs that are incurred.

One of the keys when maintaining and having readily available documentation is to ensure it is the source document for the transaction, which is the support for what initiated the transaction. This varies based on the type of cost and transaction itself, but it needs to be maintained regardless.

Examples of source documents for direct cost transactions include approved invoices, lease agreements, contracts, and other agreements.

Q: When the de minimis increases to 15 percent, will the Negotiated Indirect Cost Rate Agreement (NICRA) rate development still be required for all grant recipients? Will we be able to claim 15 percent if our NICRA is still pending?

A: Revisions to [2 C.F.R. § 200](#) regarding the increase to de minimis are effective for all awards issued on or after October 1, 2024. The U.S. Department of Labor (DOL) is making determinations about whether that rate will be effective for current grants.

HVRP Financial Management

Q: Do housing costs need to be budgeted for and in a line item of your budget?

A: Yes. 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 United States Code \(U.S.C.\) § 2023](#). Grant recipients that propose in their Budget Narrative to use funds for housing assistance (an allowable cost only for veterans recently released from jail or prison) 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 veterans

recently released from jail or prison. If a veteran who was recently released from jail or prison 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.

Q: Can the training be funded by the veteran's GI Bill, and can the supportive services to support the veteran in training be funded by HVRP?

A: VETS encourages grant recipients to make reasonable efforts to leverage other resources prior to incurring costs, if applicable. When planning to budget for participant support costs, applicants must consider the following:

- What HVRP service or activity does this participant support cost support?
- How does this help the participant in achieving their employment goals?
- Can these costs be covered by other entities?
- How long will the participant support cost for recurring expenses be incurred for the participant?
- How will the participant be able to cover this cost once placed into employment?

Q: Suppose we determined that bicycles are needed for our veterans to travel to work after realizing that bus lines did not reach certain employment locations. Under allowable cost categories, if we did not specifically list bicycles under the transportation line item, would we need to amend it or can we proceed with support with approval of our GOTR that bicycle purchases would be acceptable since it is reasonable?

A: There is flexibility. For example, even if you do not have a specific category or line item for bikes in your budget, there may still be the option to purchase one. Needs are typically identified through the intake and assessment process and outlined in the employment plan. A participant support payment is made to, or on behalf of, eligible participants for temporary assistance required to support the individual's employment plan. A participant support cost should be reasonable and necessary to enable a participant to obtain services and activities related to the employment plan. In accordance with [2 C.F.R. § 200.308](#), no prior approval is needed for cost-related changes, including re-budgeting of funds or deviating purchases from the Budget Narrative, unless the change results in meeting one of the items listed in [VPL 04-24 Section V](#) that requires an amendment application. If a grant recipient determines a need to expend funds that are not listed within their most recently approved Budget Narrative, the grant recipient must consult with their GOTR for technical assistance.