



# **Homeless Veterans' Reintegration Program (HVRP) Post-Award Conference (PAC): Allowable Costs and Case Management Documentation**

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# Today's Speaker



**Chris Brown**

*HVRP Lead*

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

✉ [brown.chris.e@dol.gov](mailto:brown.chris.e@dol.gov)

📞 (202) 693-2990



**Sarah Chung**

*Technical Assistance Coach*

*National Veterans' Technical Assistance Center (NVTAC)*



# **Allowable and Unallowable Costs**

# An Allowable Cost Must (1 of 3):



- Be authorized under [2 Code of Federal Regulations \(C.F.R.\) Part 200 Subpart E](#) Cost Principles
- Be allocable to the award under the provisions of the applicable cost principles
- Be necessary and reasonable for proper and efficient performance and administration of the grant or cooperative agreement
- Be necessary and reasonable for the performance of the federal award. Performance for HVRP is established through the indicators listed in the Funding Opportunity Announcement (FOA) and is 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: [2 C.F.R. § 200.403 Factors affecting allowability of costs](#)

# An Allowable Cost Must (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, 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: [2 C.F.R. § 200.403 Factors affecting allowability of costs](#)

# An Allowable Cost Must (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: [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: [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: [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: [2 C.F.R. § 200.404 Reasonable costs](#)

# Unallowable Costs



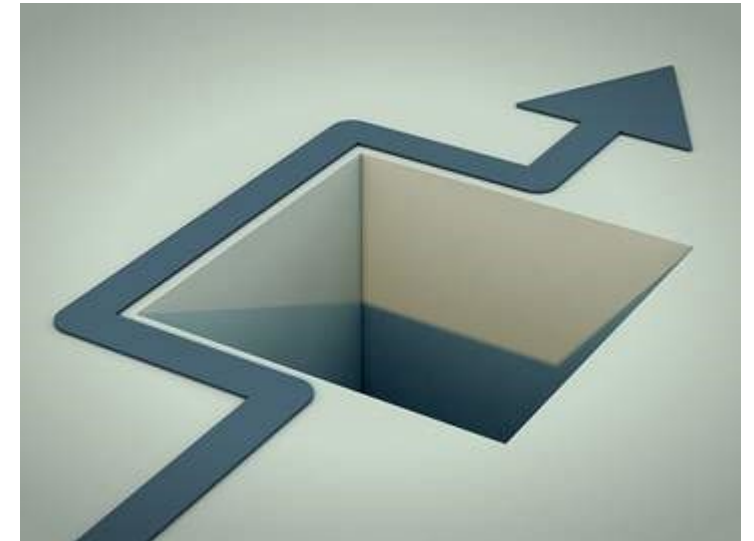
- **An allocable cost may not be allowable or reasonable**
  - Cost incurred for the award could not be authorized under 2 C.F.R. § 200 Subpart E but still meets the definition of allocable.
- **Costs must be incurred for the award to which they are charged**
  - An HVRP program director spends 40 percent 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?



# What can HVRP Pay for? Participant Support



- A participant support cost may only be provided to participants to enable their participation in HVRP services and must be tied to a specific HVRP service; it is not intended to meet every need of the participant.
- A participant support payment is made to, or on behalf of, eligible participants for temporary assistance required to support the individual's employment plan (IEP).
- A participant support cost must be reasonable and necessary to enable a participant to take part in services and activities related to the employment plan.
- VPL 06-24 lists common participant support costs for HVRP participant that is allowable.
  - Identifies the unallowable costs that cannot be made to, or on behalf of, eligible participants with HVRP funds.
- Using HVRP funds for Participant Support costs requires a standard operation procedure (SOP) in accordance with VPL 06-24 Section VI. B.

# What can HVRP Pay for? Incentives



- Incentives may be provided to enrolled participants and participants maintaining employment throughout the 12-month retention period.
- Incentives may not be provided for entertainment, such as movie tickets, sporting event tickets, or other entertainment purposes. Incentives must not be provided for the purchase of alcohol, e-cigarettes, e-liquids, tobacco, etc.
- Incentives may not be given to a veteran to simply entice them to enroll into HVRP.
- Using HVRP funds for participant incentive costs requires an SOP in accordance with VPL 06-24 Section VI. B.
  - Outlines a disbursement policy and tracking system to ensure supportive services are implemented and executed consistently and equitably before incentives are dispersed.

# What can HVRP Pay for?



- Assistance with transportation (including bikes, bus passes, gas cards, etc., if reasonable and necessary to obtain or retain employment). Incentives may not be provided for entertainment, such as movie tickets, sporting event tickets, or other entertainment purposes. Incentives must not be provided for the purchase of alcohol, e-cigarettes, e-liquids, tobacco, etc.
- Assistance with child care and dependent care, if eligible
- Assistance with housing for veterans transitioning from certain institutions, if eligible
- Uniforms or other appropriate work attire and work-related tools or other related items necessary for training or employment
- Assistance with books, fees, supplies, and other necessary items for job-driven training
- Payments and fees for employment and training-related applications, tests, and certifications

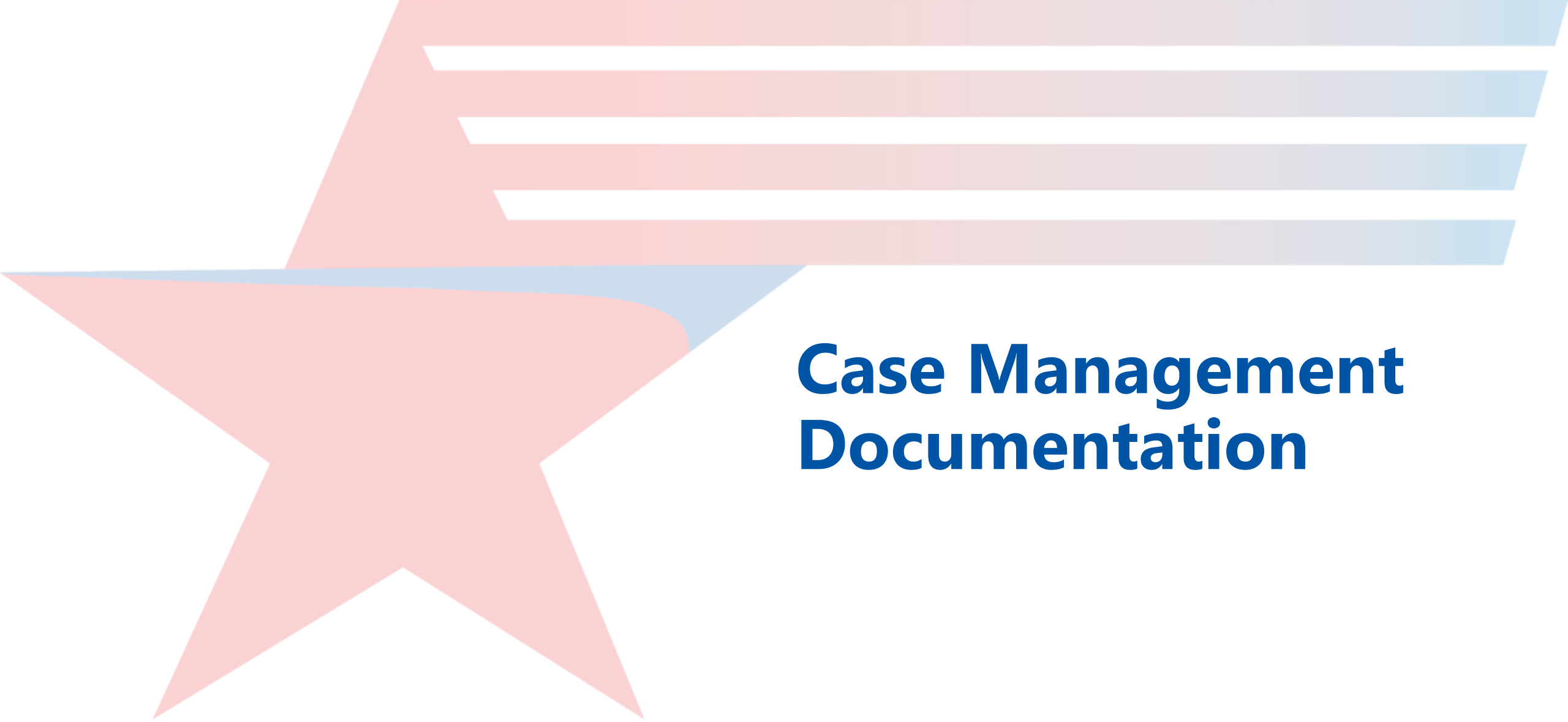
For more examples, please refer to VPL [06-24](#).

# What can HVRP not Pay for?



- Assistance in paying for expenses that are directly refundable to the participant
- Expenses related to titled or deeded items or when recovery of such expense is anticipated (e.g., rent or housing deposits, mortgage payments, homeowner's insurance, property taxes, car payments, purchase, rental, or lease of vehicles)
- Expenses for household items or supplies not directly related to the participant's employment plan
- Expenses incurred prior to enrollment into the HVRP
- Expenses for training after the participant exits the program
- Membership fees not required to obtain employment
- Any other costs unallowable under 2 C.F.R. Part 200 Subpart E

All costs must support the goals and objectives of HVRP and must be adequately documented within the participant case file. The use of a participant support cost is determined on an individual basis, and the grant recipient is required to have an SOP in accordance with VPL 06-24.



# **Case Management Documentation**



# Case File Contents



- At a minimum, the following items are expected to be available in the case management file at the time of the on-site visit:
  - Form DD-214 or other official proof of veteran status
  - Intake form
  - Assessment
  - Verification of homelessness/at-risk status
  - Education history
  - Employment history
  - Marketable skills
  - Licenses and credentials
  - Job referrals (date and name of employer)
  - Supportive services
  - Documentation of services provided
  - Individual Development Plan (IDP)/IEP
- **Don't forget to maintain Personally Identifiable Information (PII)!**



# **Documented Services**

# Documented Services (1 of 4)



- What services were provided, by whom, and when. Examples of services:
  - Physical and psychological health referrals
  - Testing
  - Resume assistance
  - **Training (list the name of training and agency; include costs and appropriate documentation associated with training)**
  - Work clothing (list exactly what was purchased with grant money and the cost; include receipt[s])
  - Any tools for their employment (again, list exactly what was purchased with grant money and the cost; include receipt[s])
  - Other supportive services provided (driver's license, birth certificate, bus passes/gas cards, etc.; include receipt[s])
  - Shelter provided and by what organization; other housing assistance as it pertains to your specific grant

# Documented Services (2 of 4)



- Job clubs (list the dates of attendance)
- Employment workshops (list dates)
- Referrals to other agencies for services:
  - U.S. Department of Veterans Affairs (VA)
  - Housing and Urban Development (HUD)
  - State Vocational Rehabilitation (not the VA)
  - Vet Center
  - American Job Center (Supplemental Nutrition Assistance Program [SNAP], Employment and Training [E&T], Jobs for Veterans State Grants [JVSG], Workforce Innovation and Opportunity Act [WIOA], Federal Bonding, Work Opportunity Tax Credit [WOTC], etc.)
  - Online referrals to supportive services
- This list is not exclusive; annotate any and all services provided to the client

# Documented Services (3 of 4)



- Referrals to other agencies and homeless programs
  - Record dates, times, and names of the agencies to which you have referred the veteran
  - When possible, call the service provider in advance to discuss the purpose of the referral
  - Conduct follow-up with the veteran and/or agency and record the results of each referral in case notes; update IDP/IEP as necessary
  - It is the grant recipient's responsibility to de-conflict enrollees with other nearby organizations operating the same type of grant – no duplicate participants are permitted!

# Documented Services (4 of 4)



- Each training course that the veteran attends should be documented in the case file and include, at a minimum:
  - Date conducted
  - Name of training course (copy of curriculum, if applicable)
  - Organization and name person conducting the training
  - Copy of certificate of completion in the case file
  - Cost of the training if a vendor was used; include invoice(s)

# Employment Documentation



- Employment information **must** be documented
- The data recorded in the case management file will ensure proper reporting and validation
- The following information should be recorded:
  - Date of employment
  - Name and address of employer
  - Name and telephone number of person who validated the veteran's employment
  - Job title
  - Salary/hourly wages paid
  - Full time or part time; hours worked per week

# Questions?



If we are unable to address any questions today, please forward your questions through your GOTR. Your GOTR will answer your question, or your inquiry will be forwarded through your regional office to be addressed.





**Thank you!**