



Homeless Veterans' Reintegration Program (HVRP) Post-Award Conference: Conditions of Award (CoA), Program Compliance Notices (PCN) and Amendments

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Today's Speaker



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Conditions of Award (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.

*FOA-VETS-23-6
Homeless Veterans' Reintegration Program
Conditions of Award*

|

Grant Recipient Name:

Grant Number:

As part of the Condition of Award (CoA) to receiving the Homeless Veterans' Reintegration Program award, the U.S. Department of Labor (DOL), Employment and Training Administration (ETA) on behalf of the Veterans' Employment and Training Service (VETS) has identified the following areas that require further clarification and/or amending.

The grant award recipient must respond to the items cited **within 45 days** of receipt by submitting an amendment request in GrantSolutions (GS) or by providing their Grant Officer's Technical Representative (GOTR) with the requested documentation.

The amendment request must address all items identified as a CoA and include a cover letter on organizational letterhead, signed by the Authorized Representative.

Please note that a submittal of the required document(s) does not constitute approval by ETA/VETS. Your GOTR will review the documentation before the Grant Officer formally approves the amendment to the grant agreement. Once approved, the revised document(s) will comprise the official amendment to this grant agreement and the CoA will be resolved.

Should you have any questions regarding this award, please contact your GOTR.



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 2)

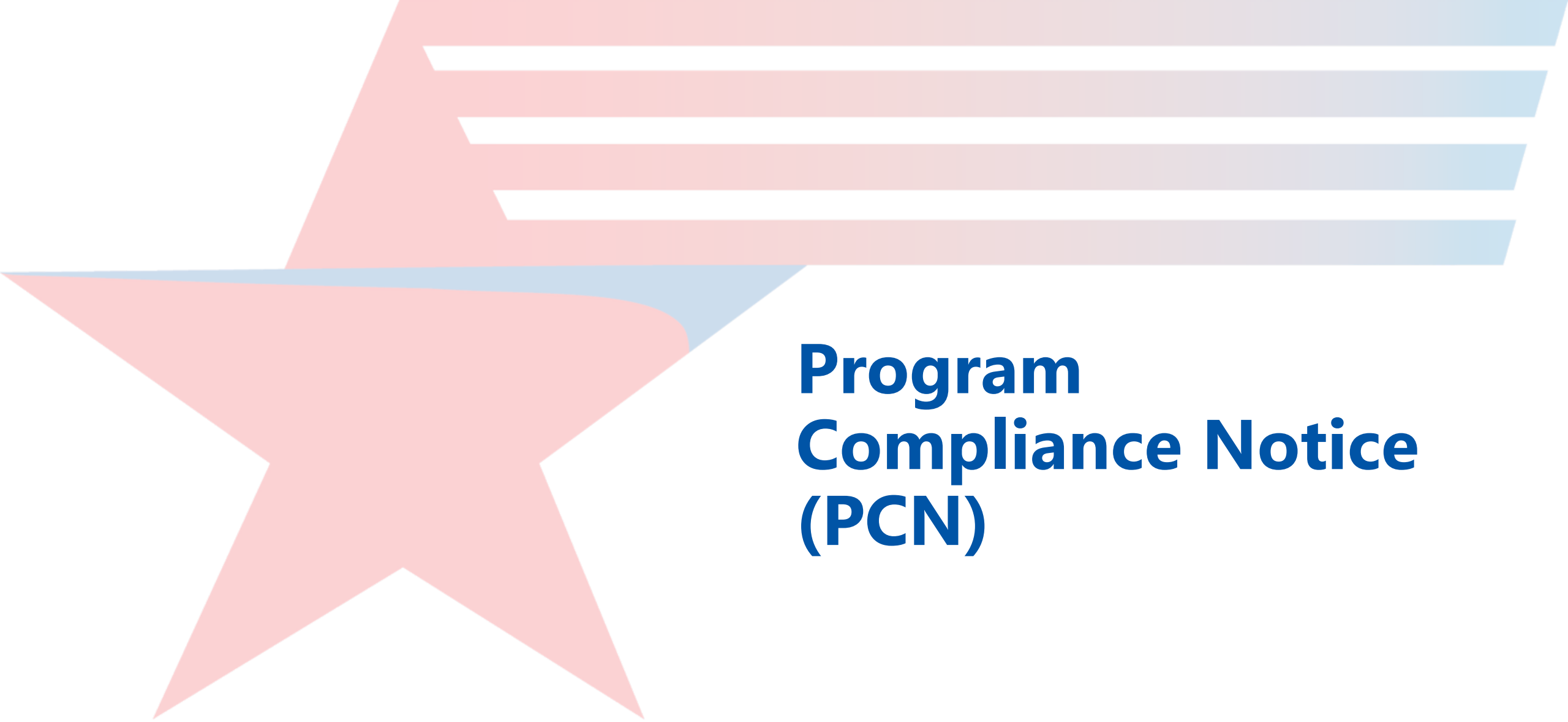


- Grant recipients not meeting the conditions and timeline for submission run the risk of impacting their funding or having additional conditions imposed.
- To reduce some common reasons for Grant-Officer-imposed conditions, please pay extra attention to the following areas:
 - Review the Budget Narrative 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 2)



- Performance CoA. The grant recipient must work with the GOTR to submit a revised Attachment A VETS-704 within 45 calendar days of the federal award date identified on the top right of the NoA. The grant recipient will initiate a SOW change amendment in accordance with Veterans' Program Letter (VPL) 04-24 in GrantSolutions (GS).
- The NoA will contain
 - A summary of the issue;
 - A write-up that identifies the errors and required revisions to the Abstract and/or Planned Goals Chart (PGC), to include screenshots; and
 - Instructions on how to proceed, i.e., submit a revised Attachment A VETS-704 form with the number of annual enrollments planned for ANYSTATE-500 in the Abstract-2 tab.



Program Compliance Notice (PCN)

What is a PCN?



- Accompanies initial or supplemental Notice of Award (NoA) as a supplemental narrative attachment, like a CoA.
- Sets forth requirements for the grant recipient, directing them to take a specific action that may require further clarification, confirmation, and/or an amendment.
- Read the PCN, follow up GOTR, and comply with the instructions.

FOA-VETS-25-01
Homeless Veterans' Reintegration Grant Program

Grant Recipient Name:

Grant Number:

As part of the condition to receiving the Homeless Veterans Reintegration Program Award, the U.S. Department of Labor (DOL), Employment and Training Administration (ETA), on behalf of the Veteran's Employment and Training Service (VETS) has identified area(s) of concern that may require further clarification, confirmation, and/or an amendment. We have also included Program Compliance Notes (PCNs). Failure to abide by the PCNs may result in future compliance findings and/or disallowed costs.

Program Compliance Notes (PCNs)

Grant recipients must thoroughly review PCNs. Failure to abide by the PCNs may result in future compliance findings and/or disallowed costs. PCNs may require consultation with your (GOTR). This consultation will assist you in determining the appropriate corrective action. Corrective actions may be confirming with the GOTR that you understand the requirement, or you clarify what approach will be taken. In some cases, in consultation with your GOTR, a future grant amendment may be needed. The grant recipient must respond to PCNs, if required, within **45 days** of receipt of the grant award.

PCN 1 - Executive Order Alignment

You must review your grant award in its entirety to confirm that it fully complies with Executive Orders "Ending Radical and Wasteful Government DEI Programs and Preferencing" and "Ending Illegal Discrimination and Restoring Merit-Based Opportunity" (recipients are not required to comply with the certification provision in sec. 3(b)(iv) of this EO). Any activities and expenditures that do not align with these Executive Orders must be removed by amendment to your grant agreement. You must submit revised materials within 45 days to your Federal Project Officer for whom the name and contact information can be located on the first page of the Notice of Award in field #10.

PCN 2 - 50-Mile Radius Notice

VETS requires Program Year (PY) 2025 HVRP awardees to maintain one or more physical locations within a 50-mile radius of each county in their proposed service delivery area (SDA). HVRP participants, who require intensive support, greatly benefit from in-person interactions. Consequently, these locations allow grant staff to be present for providing direct support and services to participants. Although HVRP grant recipients may offer virtual services, this should not be the primary or frequent method of delivery. Many HVRP participants have limited access to technology, making it challenging to receive case management services solely through virtual channels.

Specific PCNs Assigned to Awards (1 of 7)



All First-Time DOL Grant Recipient Organizations

Grant award recipients must submit a copy of their organization's financial and administrative policies and procedures for the internal control activities listed here, 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](#)).
- Note that written attestations of compliance with the above do not fulfill this requirement. Acceptance of the HVRP NoA (which contains the [Terms and Conditions](#)) implies compliance. For assistance on how to write policies and SOPs, check out NVTAC's site on [Standard Operating Procedures \(SOP\) and Continuity of Operations Plans \(COOP\) Guides and Examples](#).

Specific PCNs Assigned to Awards (2 of 7)



All **First-Time DOL** 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 PCNs Assigned to Awards (3 of 7)



All New Program Year (PY) 2025 HVRP Grant Recipient **Organization's grants**, 50-Mile Radius Notice

- Grant recipients must provide VETS with the address(es) of the location(s) where grant staff are providing services to participants that will be verified during the grant's On-Site Review.
- Sites may be co-located with American Job Centers, SSVF, etc.
- Grant recipients may change the address(es) that are currently listed in their Abstract if that new address is within a 50-mile radius of the county/counties that were served under the previous address.
- The verified address change must be documented in GS via a Grant Message.

50-Mile Radius Notice: *Language for all New Awards (not applicable for IF awards):*

VETS requires Program Year (PY) 2025 HVRP awardees to maintain one or more physical locations within a 50-mile radius of each county in their proposed service delivery area (SDA). HVRP participants, who require intensive support, greatly benefit from in-person interactions. Consequently, these locations allow grant staff to be present for providing direct support and services to participants. Although HVRP grant recipients may offer virtual services, this should not be the primary or frequent method of delivery. Many HVRP participants have limited access to technology, making it challenging to receive case management services solely through virtual channels.

VETS recognizes that leasing multiple physical sites may not be fiscally practical for all grant recipients. Instead, grant recipients may fulfill this requirement through co-location with designated partner service providers at low- or no-cost agreements, such as arrangements with American Job Centers or locations funded by the Department of Veterans Affairs (VA) Supportive Services for Veteran Families (SSVF) grant.

VETS staff will verify compliance by confirming that grant staff are physically present and providing services at the addresses listed in the VETS-704 (Abstract) during on-site reviews. While office locations may change over time, the city is the basis for defining the 50-mile radius SDA. Grant recipients must document any physical address changes via a grant message in GrantSolutions. The new physical address must be within a 50-mile radius of the counties that were served under the previous address. No changes to the grant's existing SDA will occur as a result of the new address unless there is an approved SDA change amendment. Failure to maintain a physical location will result in a managerial corrective action plan and may potentially contribute to a high-risk designation for non-compliance with grant requirements.

Specific PCNs Assigned to Awards (4 of 7)



All New PY25 HVRP Grant Recipient **Organization's grants**, 50-Mile Radius Notice, continued

- Grant Recipients will create a Grant Message (formerly known as Grant Note) in GS
 - ⇒ Subject: 50-Mile Radius Physical Address change Effective MONTH-DAY-YEAR
 - ⇒ Category Type: Other
 - ⇒ Grant recipient should state previous address of record address and new address information and effective date of change.
- This is to ensure addresses remain in compliance with the 50-mile radius and VETS is formally notified of the changes.
- This procedure does not replace HVRP amendment requirements outlined in VPL 04-24, such as the organization's address used to register the business entity in GS and the System for Award Management (SAM).

FOA Reference

Applicants **must** maintain a physical location within the identified proposed SDAs where staff will be located and provide participant support and services. As a result, you **must** provide the proposed physical address(es) where staff will be located. (This information **must** also be included in the Abstract (tab 1 in Attachment A).) For definition of physical address, please refer to the HVRP Glossary of Terms. The address(es) **must** be within 50 continuous miles of each proposed SDA. The following sites provide an estimate for this information: [StatsAmerica](#) [Big Radius Tool](#) (includes list of counties within a 50-mile radius of a city or county); [Smappen](#) (includes a map of locations that are within a 50-mile driving radius of an address); and [CalcMaps](#) (includes a map of locations that are within a 50-mile radius of an address). (Up to 1 Point)

[FY25 HVRP Funding Opportunity Announcement](#), Section IV.B.3.a. Statement of Need (pg. 16)

Specific PCNs Assigned to Awards (5 of 7)



All HVRP Grant Recipient Organizations' grant awards, Executive Order Alignment;

- You must review your grant award in its entirety to confirm that it fully complies with Executive Orders "Ending Radical and Wasteful Government DEI Programs and Preferencing" and "Ending Illegal Discrimination and Restoring Merit-Based Opportunity" (recipients are not required to comply with the certification provision in sec. 3(b)(iv) of this EO).
- Any activities and expenditures that do not align with these Executive Orders must be removed by amendment to your grant agreement.
- You must submit revised materials within 45 days to your Federal Project Officer, whose name and contact information can be located on the first page of the Notice of Award in field #10.

Specific PCNs Assigned to Awards (6 of 7)



All HVRP Grant Recipient Organizations' grant awards, Personnel Reporting;

- VETS clarifies a "Personnel Position" as a position generally held by one individual whose salary and fringe benefits are charged to the grant, per the most recently approved Budget Narrative.
- The time charged for one Personnel Position must be within ± 10 percent of the amount approved in the most recently approved Budget Narrative.
- Grant recipients that charge an individual employee among multiple HVRP grants cannot collectively exceed 100 percent of a Full Time Equivalent (FTE) in a single quarter.

PCN 3 - Personnel Reporting

In accordance with the 2 C.F.R. 200.404 definition of "reasonable," VETS clarifies a "Personnel Position" as a position generally held by **one** individual whose salary and fringe benefits are charged to the grant, per the most recently approved Budget Narrative (unless there is another individual covering for that position due to approved leave or vacancy from the position). The time charged for one Personnel Position must be within $\pm 10\%$ of the amount approved in the most recently approved Budget Narrative. In addition, two persons must not charge to a single position for more than two consecutive quarters (e.g., two employees charging 50% of time to a 100% approved position). Grant recipients that charge an individual employee among multiple HVRP grants cannot collectively exceed 100% of a Full Time Equivalent (FTE) in a single quarter.

In accordance with VPL 04-24, HVRP Award Amendments, grant recipients work with their assigned GOTR to add or eliminate grant staff positions and/or revise position(s) percentage of time to align with this requirement. VGRS will record, throughout the grant's period of performance, all positions outlined in the approved Budget Narrative in the Personnel module. VGRS will flag vacancies and approved positions where the total staff percentage of time deviates by more than $\pm 10\%$. These flags will require an explanation in the Performance Report Narrative for the reporting quarter. Please see the VETS [Glossary of Terms](#) for the following definitions:

- Personnel – Position
- Personnel – Position - Consecutive Quarters Maximum
- Personnel – Position - Percentage (%) of Time
- Personnel – Position - Vacant Position
- Personnel – Staff - Employee Percentage (%) of Time
- Personnel – Staff - Individual Combined Quarterly Maximum
- Personnel – Staff - Deviation from Approved Percentage (%) of Time

Specific PCNs Assigned to Awards (7 of 7)



All HVRP Grant Recipient Organizations' grant awards, Personnel Reporting, continued;

- Grant recipients work with their assigned GOTR to add or eliminate grant staff positions and/or revise position(s) percentage of time to align with this requirement.
- VGRS will record, throughout the grant's period of performance, all positions outlined in the approved Budget Narrative in the Personnel module.
- VGRS will flag vacancies and approved positions where the total staff percentage of time deviates by more than ± 10 percent.

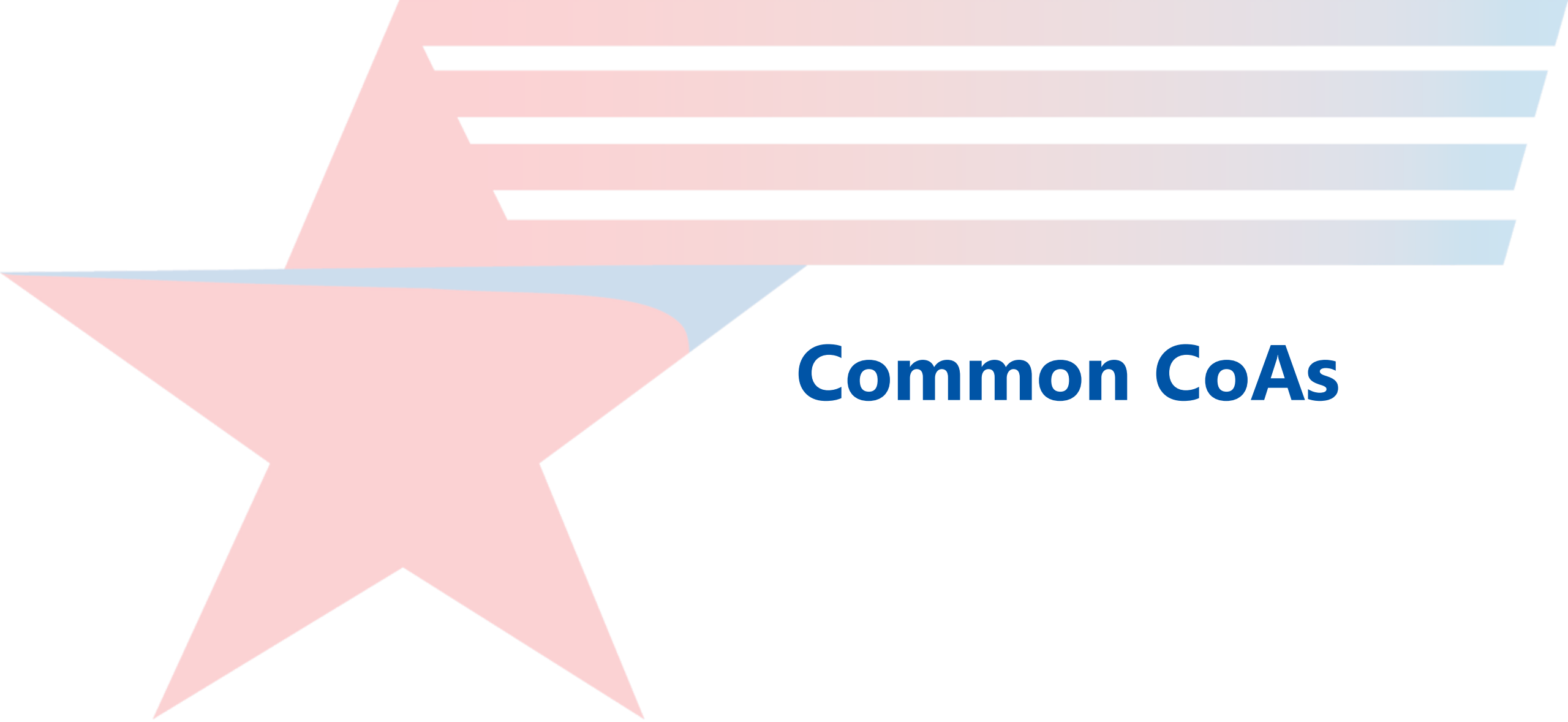
Please see the HVRO Glossary of Terms under the [Resources](#) section of the HVRP [website](#) for Personnel-related definitions.

PCN 3 - Personnel Reporting

In accordance with the 2 C.F.R. 200.404 definition of "reasonable," VETS clarifies a "Personnel Position" as a position generally held by **one** individual whose salary and fringe benefits are charged to the grant, per the most recently approved Budget Narrative (unless there is another individual covering for that position due to approved leave or vacancy from the position). The time charged for one Personnel Position must be within $\pm 10\%$ of the amount approved in the most recently approved Budget Narrative. In addition, two persons must not charge to a single position for more than two consecutive quarters (e.g., two employees charging 50% of time to a 100% approved position). Grant recipients that charge an individual employee among multiple HVRP grants cannot collectively exceed 100% of a Full Time Equivalent (FTE) in a single quarter.

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Common CoAs

Common CoAs



Revised
Document

Indirect Costs
(Exceeded
allowable limit -
NICRA)

Indirect Costs
(Exceeded
allowable limit -
15% De Minimis)

VETS-700
Planned Goals
Chart

Budget
(Miscategorized
Costs)



Revised Documents CoA

- The SF-424 line 18a, SF-424A, and Budget Narrative must reflect a one-year budget.
- The SF-424A totals must match the Budget Narrative.

Sample CoA Language

Condition X – Revised SF-424A and Budget Narrative

The grant award recipient must submit an amendment request with a revised SF-424A and Budget Narrative that reflects the first-year increment for this award.

Example Source Documents

18. Estimated Funding (\$):	
* a. Federal	344,695.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	344,695.00

SF-424

i. Total Direct Charges (sum of 6a-6h)	\$1,011,301.00
j. Indirect Charges	\$22,784.00
k. TOTALS (sum of 6i and 6j)	\$1,034,085.00

SF-424A

Three - Year Budget Narrative

Amount of Request: \$1,011,301

Budget CoA (1 of 8)



Sample CoA Language

CoA X – Budget Clarification

The Budget Narrative must include enough detail for all expenditures to demonstrate their valuations and adherence to the Uniform Guidance [Cost Principles](#). Specifically, the grant recipient must clarify the following costs:

-

The grant recipient must submit a budget amendment request that includes an updated Budget Narrative. The Budget Narrative must include enough information to ascertain whether the costs are reasonable, necessary, allowable, allocable, and mathematically accurate. If any costs are moved to a different cost category, a SF-424A will be required as well.



Personnel



Travel



Equipment



Indirect Cost



Fringe Benefits



Supplies



Construction



Other

Budget CoA (2 of 8)



Personnel

Should provide all staff positions by title (both current and proposed) including the roles and responsibilities. Individuals hired by an employment contract should be listed in this category. For each position, the following should be listed:

- Annual salary
- Percentage of time devoted to the project
- Amount of each position's salary funded by the grant

Personnel		
Amt	Percentage	Total
\$100,000.00	25%	\$25,000.00
\$80,000.00	90%	\$72,000.00
\$55,000.00	100%	\$55,000.00
\$27,000.00	100%	\$27,000.00
	Total	\$179,000.00

Sample CoA Language

Specifically, the budget narrative must clarify the following:

- Personnel – Please provide the (*insert the issue*)

SAMPLE BUDGET NARRATIVE

- I. PERSONNEL – TOTAL \$179,000
- Program Director (1) - Responsible for program implementation, staff supervision and compliance with program performance goals. (0.25 FTE @ \$100,000 = \$25,000)
- Case Manager (1) - Responsible for direct case management and aftercare for participants. (0.90 FTE @ \$80,000 = \$72,000)
- Engagement Specialist (1) - Responsible for retention and engagement of participants and employers and aftercare for participants. (1.0 FTE @ \$55,000 = \$55,000)
- Program Support (1) - Responsible for assisting with the coordination of supportive services. (1.0 FTE @ \$27,000 = \$27,000)

Budget CoA (3 of 8)



Fringe Benefits

Provides a breakdown of the amounts and percentages that comprise fringe benefit costs, such as health insurance, Federal Insurance Contributions Act (FICA), retirement, etc. Some organizations may not break the costs down and may just have a percentage.

Fringe		
Percentage	Listed Amt	Totals
3.00%	\$152,000.00	\$4,560.00
3.00%	\$152,000.00	\$4,560.00
7.65%	\$152,000.00	\$11,628.00
5.50%	\$152,000.00	\$8,360.00
		\$29,108.00
19.15%		
Match Total		\$29,108.00

Sample CoA Language

Specifically, the budget narrative must clarify the following:

- Fringe Benefits – Please provide the *(insert the issue)*

SAMPLE BUDGET NARRATIVE

I. FRINGE BENEFITS TOTAL \$29,108

Includes health insurance @ 3.00%, life insurance @ 3.00%, FICA 7.65%, and Worker's Compensation insurance @ 5.50%. Calculated at 19.15% of \$152,000 = \$29,108.00

Budget CoA (4 of 8)



Travel

- Must be for grant recipient staff only
- The following should be provided:
 - The purpose
 - Number of staff traveling
 - Mileage
 - Per diem
 - Estimated number of in-state and out-of-state trips
 - Other costs for each type of travel
- Expenditures do not exceed 15 percent of the total HVRP funds requested in the application. If so, a justification must be provided.

Sample CoA Language

Specifically, the budget narrative must clarify the following:

- Travel – Please provide further written justification for *Mileage and expenses*, specifically: Expenses. The narrative only provides a calculation for mileage.

Travel				
Staff	Quantity	Cost per unit	Miles	Total
1	1	\$485.000	0	\$485.00
1	3	\$258.000	0	\$774.00
1	3	\$60.000	0	\$180.00
1	1	\$400.000	0	\$400.00
1	12	\$0.67	355	\$2,854.20
1	1	\$0.00	0	\$0.00
1	1	\$0.00	0	\$0.00
1	1	\$0.000	0	\$0.00
Total				\$4,693.20
Match Totals				\$4,693.20

SAMPLE BUDGET NARRATIVE

I. TRAVEL TOTAL \$4,693

This includes attendance for one FTE to attend the National Coalition for Homeless Veterans (NCHV) and/or the National Association for Workforce Professionals. It includes registration fees (\$485), three nights of hotel stay (\$774), meals (\$180), and airfare with baggage fees (\$400). Attending these events helps our staff gain insights and connections to better serve veterans and improve their job prospects. (Subtotal \$1,839.)

Mileage and expenses for staff site visits and community outreach events, which are estimated at \$237.85/month. $(355 \text{ miles/month} \times 0.67) \times 12 = \text{Subtotal } \$2,854$

Budget CoA (5 of 8)

Equipment

- Per unit cost of \$10,000 or more (1 item = \$10,000)
- The following should be provided:
 - Item
 - Quantity
 - Unit cost per item



Sample CoA Language

Specifically, the budget narrative must clarify the following:

- **Equipment – Printer and Copier** – Please move to Supplies or Other. Items listed in this category must be valued at \$5,000.00 or more. Please also break down cost per item.

SAMPLE BUDGET NARRATIVE

I.	Equipment	TOTAL \$1,000
	Printer and Copier – to be purchased for staff usage.	

Budget CoA (6 of 8)



Supplies

- Supplies include all tangible personal property other than "equipment"
- The following should be provided:
 - Cost categories of supplies (e.g., office supplies)
 - For items other than office supplies, the item, quantity, and unit cost per item must be provided.

Sample CoA Language

Specifically, the budget narrative must clarify the following:

- Supplies – Laptops (8) @ 5,000 each = \$40,000. Please review all items listed under this category for reasonableness, as all proposed project costs should be necessary and reasonable in accordance with the federal guidelines. In addition, please provide further written justification.

Supplies		
Cost Per Unit	Units	Total
\$1,200.00	2	\$2,400.00
\$600.00	1	\$600.00
\$12.00	12	\$144.00
\$62.00	2	\$124.00
\$24.99	12	\$299.88
\$75.00	8	\$600.00
\$6.00	10	\$60.00
Total		\$4,227.88
Totals		\$4,227.88

SAMPLE BUDGET NARRATIVE

I. Supplies TOTAL \$4,227.00

Multi-Function Device - Copier/Printer (2) @ = \$1,200 = \$2,400. Boxed Paper (\$50.00 mthly x 12 = \$600. Pens (12) boxes x 12 = \$144.00. External Storage hard drive USB (2) @ 62.00 each = \$124.00. File Folders (12) X \$24.99 = \$299.88. Ink cartridges (8) @ 75.00 each = \$600.00. Rolls of tissue (10) @ \$6.00 a pack = \$60.00. (subtotal = \$4,227.88)

Budget CoA (7 of 8)



Supplies (continued)

- Miscategorized Cost
 - Items listed that are not tangible



Examples: Software, Services, Licenses, Microsoft Office products, Information Technology (IT) Solutions and Security Networks

Sample CoA Language

Condition X – Budget (Miscategorized Costs)

The grantee must submit a budget amendment request which includes a completed SF-424A and budget narrative which aligns with the total on the SF-424. The budget narrative must address and break down the entirety of each line reflected on the SF-424A as outlined on pgs. 9-12 of the Funding Opportunity Announcement. The budget narrative must also contain costs per entry in each category which add up to the indicated line item total with enough information to ascertain whether the represented totals are mathematically accurate. Specifically, the budget narrative must clarify the following:

- **Supplies** – this line item is for all tangible personal property other than “equipment”. Please move CPR and Professional Development to Other.

Please submit a revised budget narrative and matching SF-424A (if applicable) to your Grant Officer Technical Representative (GOTR) within 30 days from receipt of award. Your GOTR will review the documentation and then submit it to the Grant Officer for formal approval as an amendment to the grant agreement.

Budget CoA (8 of 8)



Other

- Participant Support costs **must** be in OTHER.
- The following should be provided:
 - Clear and specific detail, including costs for each item.
 - A breakdown of costs is not required for items such as boots or clothing for participants. For example, if a grant recipient spends \$150 on each participant for clothing based on needs and do not provide a breakdown, it is acceptable.

Sample CoA Language

Specifically, the budget narrative must clarify the following:

- Other – Please provide clear and specific details as written justification, including costs, for items listed under Client Assistance, specifically *Meals*, and Incentives.
- Other – Please review all items listed under this category for reasonableness, as all proposed project costs should be necessary and reasonable in accordance with the federal guidelines. In addition, please provide further written justification as some cost listed are duplicated.
 - *Books, fees, supplies, etc. for job training @ \$25,000.00*
 - *Employment and training-related application fees, including tests and certifications @ \$10,000.*
 - *Other allowable incidentals @ 15,000*

Indirect Cost CoA



Indirect Costs: (if applicable)

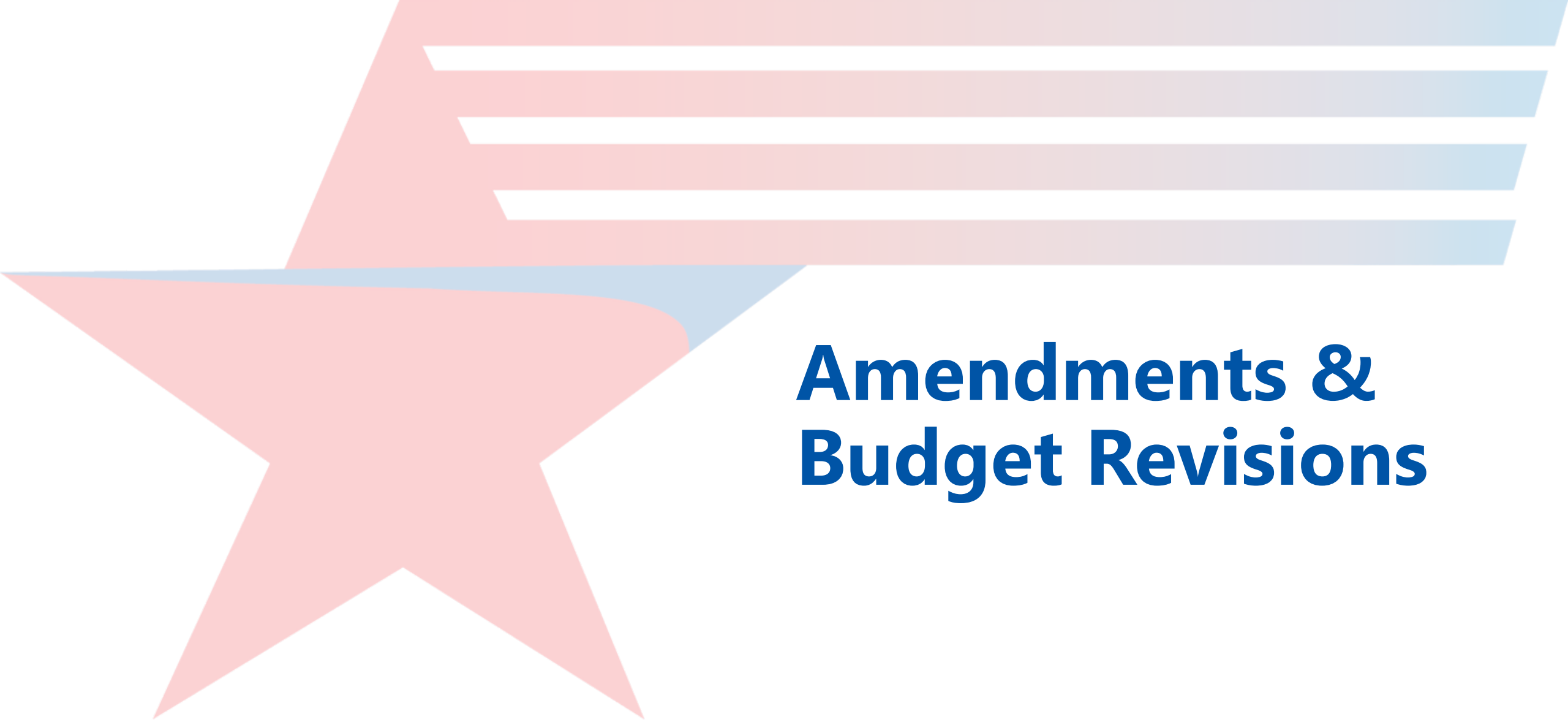
- Provides a breakdown of how the calculation was derived.
 - Is there a cost agreement matching the narrative/justification?
 - Is the base amount and rate included?
 - Are the proper exclusions deducted from the base amount?

Sample CoA Language

Condition X – Indirect Costs – De Minimis

The grant recipient has elected to utilize the de minimis rate of 15% of modified total direct costs (MTDC) available to non-Federal entities that do not have a current negotiated rate. Per the Uniform Guidance (UG) at [2 CFR §200.1](#), MTDC excludes certain costs. Based on our review, the recipient has not excluded **XXXX** from the calculation for indirect.

The grant recipient must ensure they are charging indirect costs in accordance with UG requirements. Failure to do so may result in disallowed costs. The recipient should address in future budget realignments, as needed.



Amendments & Budget Revisions

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
- Are submitted in GrantSolutions at least 30 days prior to the proposed effective date
- VETS applicable Active Policy and Guidance on Requirements for amendments:
 - [VPL 04-24 HVRP Award Amendments](#)
 - [HVRP Award Amendments Technical Assistance Guide](#)
 - [HVRP Award Amendments Forms and Documents Desk Guide](#)
 - [HVRP Budget Narrative Template](#)
 - [HVRP Award Amendments Change Request Form](#)

Amendments: What Requires an Amendment?



- A. Statement of Work Changes
- B. Administrative Changes
- C. Budget Realignment, *exceeding 10 percent budget flexibility*
- D. Purchase of equipment with a unit cost of \$5,000 or more

CoA – instances where the GO requires condition-specific instructions where the requirement to submit an amendment is necessary

Amendments: What Does Not Require an Amendment?



- A. Change to a NICRA, CAP, or election to utilize the 15 percent de minimis rate
- B. Budget Changes – 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** 1) Transfer of 10 percent or more of funds among direct cost categories, or **2) Transfer of funds budgeted for participant support costs to other categories of expense**
- C. Personnel Line Changes – Changes to HVRP staff, position, or percent of time charged to HVRP do not require an amendment application unless the change results in a transfer of 10 percent or more among direct cost categories or a change to the SOW

Amendments: FIFO and the Availability of Funds

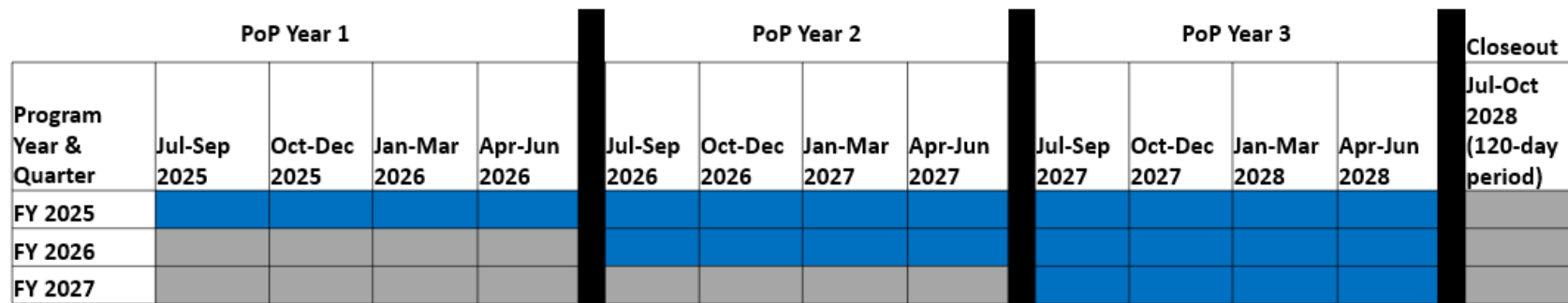


- Grant recipients that received incremental funding for PY25 (beginning July 1) will likely carry over unspent PY24 funds into the current PY.
- Grant recipients must expend carryover funds on a first-in, first-out (FIFO) basis, per [Veterans' Program Letter \(VPL\) 03-24](#). This means grant expenditures must first be charged to the funding increments awarded earliest in the period of performance (PoP) and thus have the oldest period of availability. The first increment can be identified in the Payment Management System (PMS) by a numeral after HV, i.e., HV3, HV4, HV5. The lowest numeral is your earliest funded increment with oldest availability.
- Work with your GOTR on accounting for and expending carryover.

Carryover Funding – Availability of Funds



- Example three-year PoP funding stream timeline: This graphic demonstrates when funds were awarded and are available for expenditure for a grant that was awarded a three-year PoP, incrementally funded, in PY24.



Key

- Expenditures
- Funds not available

HVRP Funding Stream Timeline

- In the base year, an SF-424, SF-424A, and Budget Narrative were submitted, and the request was submitted for incremental funding year 1 and 2.
- Each year's SF-424A and Budget Narrative will follow that award until all funds are expended.
- Each incremental funding request, a new SF-424, SF-424A, and Budget Narrative that is equal to or less than the amount requested in the abstract of the initial grant application are required.

Carryover of Prior PY Funding – Budget Options

Spending Prior Year Funds



Option 1 - No change to Approved Budget

- The grant recipient must continue to **draw funds for approved budget expenditures** until the prior year's funds are exhausted or until the PoP ends, whichever comes first.
- Must adhere to costs approved in the latest NoA's Approved Budget. **Prior Year and Current Year are combined.**

Option 2

- The grant recipient could **realign** <10 percent of the total budget to other Object Class Categories*
 - See terms & conditions and HVRP Award Amendments [VPL 04-24](#) and its [Technical Assistance Guide \(TAG\)](#)
- E.g., the grant recipient has \$20,000 remaining in PY23 from Personnel and Fringe and 10 percent of a \$300,000 award is \$30,000 – so the grant recipient could move \$20,000 to other categories of need for future budget purposes.
- **Be mindful of the effect on Indirect Cost calculations with Direct Cost budget realignments (i.e., increase or decrease of exclusions and inclusions from base)**

Option 3

- The grant recipient submits an amendment for changes >10 percent budget revision/realignment
- Remember – the grant recipient cannot incur expenditures resulting from the budget revision/realignment until approved by the Grant Officer.

Amendments: What's required to be submitted?



Required Documents and Forms	Condition of Award (COA)	Budget Revision	Statement of Work Changes	Change in Key Personnel	Incremental Funding	Admin. Changes	Purchase of Equipment of \$5,000 or more	PoP Extension	Self-Termination
GrantSolutions Amendment Type Selection	DOL - Budget Realignment	DOL - Budget Realignment	DOL - Statement of Work Change	DOL - Change in Authorized Signature or POC	DOL - Incremental Funding	DOL - Statement of Work Change	DOL - Equipment Approval (Non-Monetary)	DOL - No Cost PoP Extension	DOL - Decrease PoP (Non-Monetary)
Transmittal Memo	√	√	√	√	√	√	√	√	√
SF-424	√*				√				
SF-424A Form	√*	√**	√**		√				
Budget Narrative	√*	√	√**		√				
Project Narrative	√*		√*		√*				
HVRP Award Amendments Change Request Form	√**	√**	√**		√**			√**	

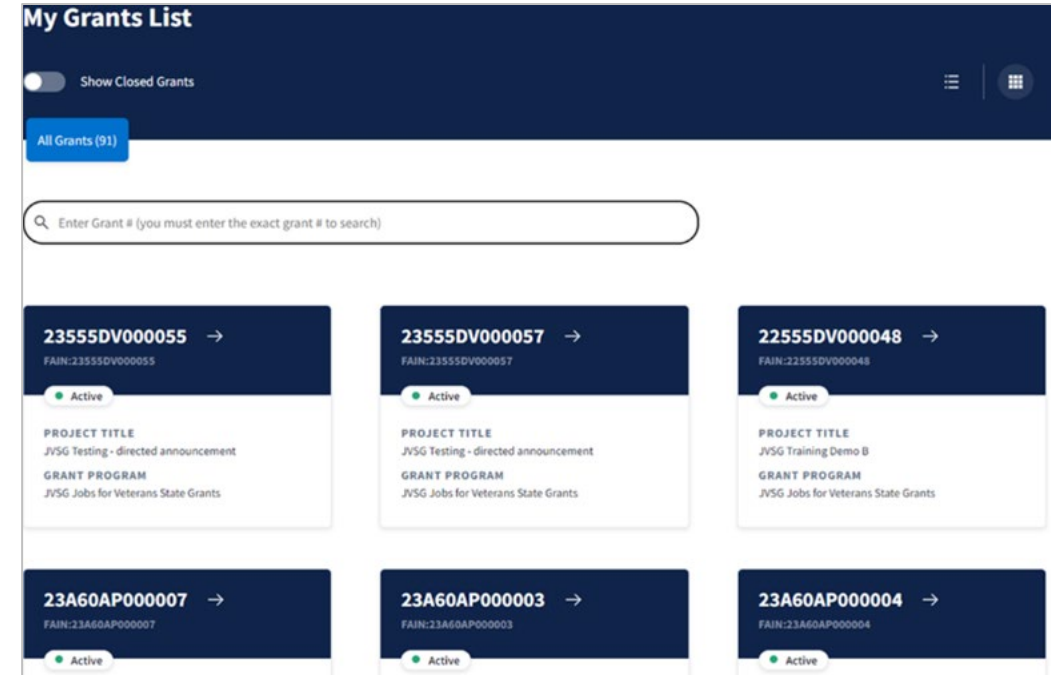
*If affected

**If Information changed

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



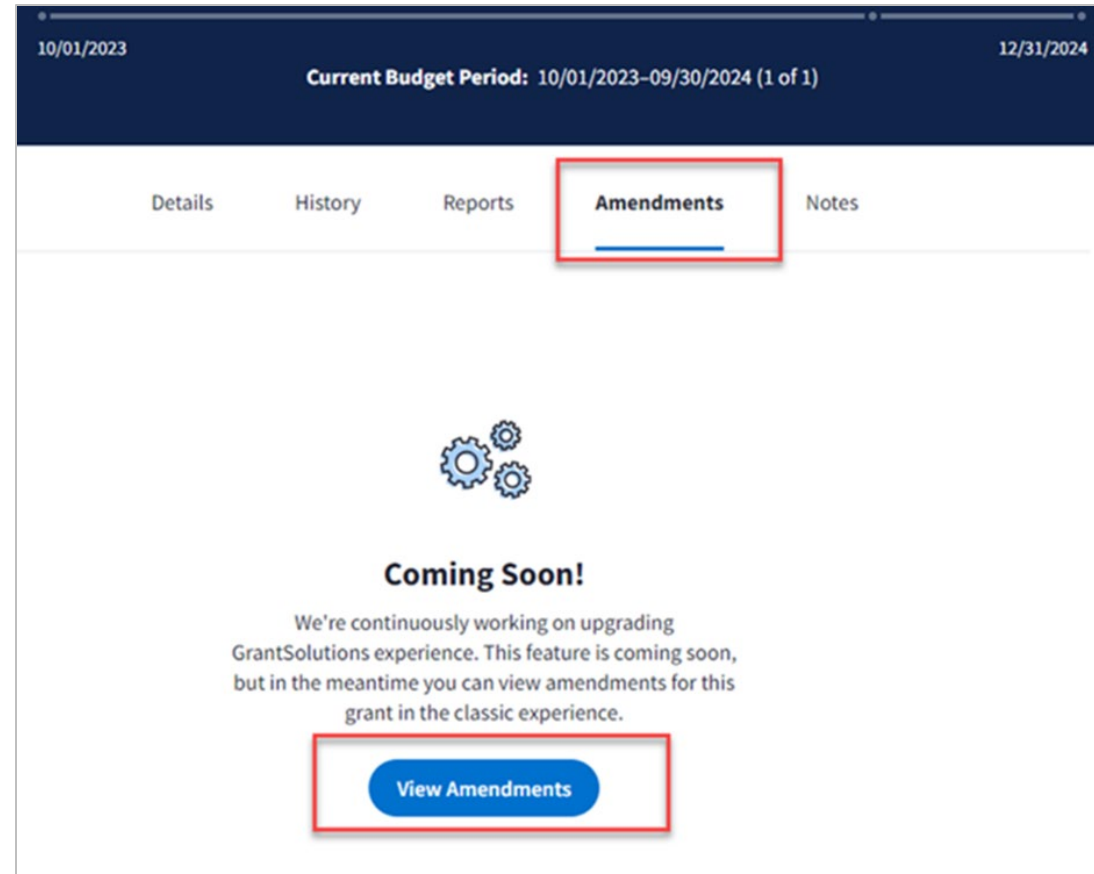
- Via GrantSolutions following steps provided in the [GrantSolutions Grants Management Module \(GMM\) Grant Recipient Guide](#)
- [Log in to GrantSolutions](#)



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



- Click the Amendments tab, and then click the View Amendments button.



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



- Select the Amendment Type, and then click the Create Amendment button.

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/PO (Type 6)
- ☐ Change in Grantee Authorizing Official (Type 6)
- ☐ Change in Scope (Type 6)
- ☐ EIN Change (Decobligate) (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)

Create Amendment

Cancel

Amendments: When Will They Be Approved?



- Amendments should be submitted at least 30 days prior to the proposed effective date of the change, but budget realignments must be submitted at least 30 days prior to the proposed effective date for the requested 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 related 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.**

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!