

# HVRP PY 2023 Incremental Funding Requests: Grant Recipient Training

### **Purpose and Goals**

All PY 2022 Conditions of Award (COA) have been issued by the Office of Grants Management (OGM). Please work with your Grant Officer's Technical Representative (GOTR) to ensure timely submission.

Grant recipients pursuing Incremental Funding (IF) for PY 2023 must submit an IF amendment in GrantSolutions (GS) for their GOTR's review no later than close of business January 18, 2023. This grant competition awards a 36-month period of performance (POP) which is funded incrementally on an annual basis. The first year of funding is received at the time of the award, and funding for years two and three are received through the annual amendment process within GS. The funding requests for years two and three must not exceed the amount referenced in the abstract of the initial grant application submitted under the applicable Funding Opportunity Announcement (FOA). We want to reduce COA that eventually get assigned once the GO reviews the entire package. We are all using GS this year for the amendment submission process. For those grant recipients that operated in PY 2021, the amendment process, which was previously called the modification process, has changed.

# Where do I start?

### What is available to me?

- The IF amendments submitted in the system pertain to PY 2023, spanning July 1, 2023, through June 30, 2024. COA for PY 2022 should be referenced to ensure the same errors and omissions are not included in the PY 2023 IF amendment application. For example, a miscategorized cost that resulted in a PY 2022 COA, is still a miscategorized cost in the PY 2023 Budget Narrative if it is unresolved. If you have unapproved COA, work from the corrected documents—not the documents that resulted in the conditions.
- Tools and resources available to you include your approved PY 2022 award package, as well as any documents resulting from conditions. As you develop your amendment application, work with your team and GOTR to determine submission and review procedures, such as external quality assurance reviews of documents or pre-established timelines. Most importantly, review and follow <u>Grant</u> <u>Officer's Memorandum 01-23, HVRP Grants Incremental Funding Procedures for Program Year 2023</u>.

### What's my Reference Document?

• As you review your IF Amendment Application, reference your currently approved award. You are only using prior award information as a guide. Your budget may have included one-time costs related to the startup of a program, or costs that fluctuated based on program and staff needs. As you respond to the GO Memorandum and <u>Technical Assistance Guide (TAG) for Homeless Veterans</u> <u>Program Grants – PY 2023 Incremental Funding Requests</u>, an enhancement or correction may be needed.



- Familiarize yourself with GS. Guides, walkthroughs, and demonstrations are available on how to submit an IF amendment at the following website: <u>https://www.dol.gov/grants/grant-solutions/training</u>.
- Following are considerations as you review reference documents:
  - Are you submitting your second year IF request? Be sure to refer to the award under FOA-22-01.
  - Are you submitting your third year IF request? Be sure to refer to your prior PY 2022 request for the most current information to compare with your PY 2023 request.

### **Documents**

The following are required documents:

- The Letter of Memorandum is signed by the authorized representative and uploaded in GS.
- Standard Form (SF)-424 and SF-424A are completed through a live form on GS. There are prepopulated fields based on your profile.
- The Budget Narrative is attached under the applicable section in GS using your preferred format.

The following documents are only required, if applicable:

- If you are using an Indirect Cost Rate Agreement or Cost Allocation Plan (CAP), it must be uploaded in GS. If Indirect Costs are not claimed, this is not applicable.
- If there are changes to the Project Narrative, the revised version must be uploaded.
- The <u>Incremental Funding Amendment Planned Goals Change Request Planned Goals Chart</u> is applicable if you would like to change or realign your goals.

### Required Documents

Letter of Memorandum

- Grant recipients are required to list future funding increments for their second and third program years in the abstract of the original award application. VETS budgets the program based on those increments.
- The Letter of Memorandum must include a sufficient level of detail that indicates the funding amount requested matches the abstract and must be signed by the authorized representative. Detailed information for the Letter of Memorandum is outlined in GO Memorandum 01-23 Attachment 1, <u>Technical Assistance Guide (TAG) for Homeless Veterans Program Grants PY 2023 Incremental Funding Requests</u>.

#### SF-424 (Individual Family of Documents)

• The amount entered on the SF-424 must not exceed the amount referenced in the abstract of the original grant application.



- You will fill out the SF-424 and SF-424A through the online form unless the behavior of the form is not functional. In this case, reach out to GS. Per the GO Memorandum and TAG, the online forms must be utilized.
- The SF-424 is different this year in GS, as many of the areas that were traditionally entered manually are pre-populated based on the information provided at the time the grant was established in GS. Do not alter the prepopulated information unless it is incorrect.
- Be sure to check for the following:
  - Block 2: Marked **Revision** and selected **A: Increase Award**.
  - Refer to the <u>TAG for Homeless Veterans Program Grants PY 2023 Incremental Funding</u> <u>Requests</u> for more detailed requirements and information on specific entries.

# SF- 424A Budget Information

- The SF-424A must be completed online in GS, reflect the amount on the SF-424, and crosswalk to the Budget Narrative and the Letter of Memorandum. There are multiple documents that must reference the same amount of funds, and consistency is important.
- If you are claiming Indirect Costs or De Minimis, ensure they are placed on the correct line.
- Be sure to check for the following:
  - Section A: Ensure the Grant Program includes HVRP, the Catalog of Federal Domestic Assistance (CFDA) (17.805) number (column b), and the estimated federal funding amount in columns e and g are input.
  - Refer to the <u>TAG for Homeless Veterans Program Grants PY 2023 Incremental Funding</u> <u>Requests</u> for more detailed information on specific entries pertaining to blocks that are not pre-populated.

### Budget Narrative

- Be sure to take your time with the Budget Narrative.
- Be sure to use whole numbers.
  - The Budget Narrative's total should match both the SF-424, the SF-424A, and the Letter of Memorandum.
  - Review each line item carefully. Line-item totals should match the line items on the SF-424A. Some grant recipients have used Excel to ensure accuracy.
  - Review the methodology proposed for each line item. It is critical to ensure the math is correct, so the total matches the SF-424A.
- In the past, methodology as it pertains to supplies has been challenging. It is important to have a clear and transparent methodology for office supplies. Do not write "etc." because, in an audit, "etc." cannot be quantified.
- Example: General office supplies (pens, paper, notebooks, folders, wipes) \$125 per month x 12 months = \$1,500.



- If you are proposing to purchase laptops, printers, etc., include the per-unit cost to determine reasonableness.
- Allowability, allocability, and reasonableness must be communicated in your Budget Narrative when it comes to all costs in your grant award. However, each general office supply will not need to be broken down.
- Refer to the <u>TAG for Homeless Veterans Program Grants PY 2023 Incremental Funding Requests</u>, Section IV, for further information.

Approval Letters for Negotiated Indirect Cost Rate Agreement (NICRA), De Minimis, or CAP

- Not all grant recipients use an Indirect Cost Rate. If your grant falls under this category, you will not include indirect charges on your SF-424A.
- For programs that use an Indirect Cost Rate, scenarios will differ for each grant recipient. Refer to your Terms and Conditions covering Indirect Costs and work with your GOTR.
- Variations submitted by the grant recipient include:
- Current Approved NICRA or CAP.
- Verification of a request for an updated NICRA or CAP has been submitted.
- De Minimis (not to exceed 10 ten percent) and use of the Modified Total Direct Cost (MTDC).
- For multi-page NICRA and CAP documents, provide only the documents that verify approval with the Office of Cost Determination (OCD) versus the entire approval package.
- Additional Information on De Minimis:
- Grant recipients can request a De Minimis rate not to exceed 10 percent.
  - This rate is available for grant recipients that do not have a current negotiated (including provisional) rate. See 2 C.F.R. § 200.414(f) for more information on the use of the De Minimis rate.
  - Review the Terms and Conditions of your program's award—Part B: Indirect Costs, Budget and Cost Share.
  - There is an <u>Indirect Cost 101</u> training available through the National Veterans' Training Institute.

### Additional Documents if Applicable

#### **Project Narrative**

- The Project Narrative is only required if you request to change the project's scope of work. The official grant file is in GS, so the Project Narrative is already in the system and an additional copy does not to be uploaded.
- Following are examples of changes to the grant:
  - A grant recipient requests to change the scope of their award (i.e., changing the service delivery area [SDA]).
  - A grant recipient seeks to sub-award some of their program to a contractor or sub-recipient.



- A grant recipient requests a change to their cumulative goals in accordance with <u>Veterans'</u> <u>Program Letter (VPL) 03-18 – Grant Modification Request Due to Unanticipated</u> <u>Circumstances Resulting in Poor Performance</u>.
- Changes to the planned cumulative goals are a change in the COA and require sufficient justification, as well as approval by the GO, in accordance with <u>VPL 03-18</u>. changes in the Project Narrative should be discussed with your GOTR before submission to ensure they are in accordance with the grant/FOA/Terms and Conditions, and the elements of program's design.

# IF Amendment Planned Goals Change Request Planned Goals Chart

- <u>VPL 03-18</u> describes compelling circumstances that may be beyond the reasonable management and control of the grant recipient where VETS would consider changes to a grant recipient's cumulative goals. VETS defines a compelling circumstance beyond the reasonable management and control of the grant recipient as an unanticipated event jeopardizing the successful attainment of grant deliverables despite all reasonable efforts to avoid these negative consequences. Please review <u>VPL</u> 03-18 on the <u>VETS Policy Guidance</u> website for more details, and work with your GOTR if you feel your organization falls within this category.
- The <u>IF Amendment Planned Goals Change Request Planned Goals Chart</u> is required if recipients are requesting to realign their approved quarterly performance goals or requesting to change their cumulative goals in accordance with <u>VPL 03-18</u>.
- If you are not changing your goals, you are held to the cumulative performance goals submitted in your application for each year of the POP. If you seek to realign your goals, or to be approved for a consideration under <u>VPL 03-18</u>, you must use this form.

# System for Award Management (SAM) Verification

- Ensure your SAM has not expired. If it is not current, your second or third increment cannot be funded. It has been reported some changes have resulted in a backlog, so be sure to get ahead on this process.
- If there is a circumstance where your SAM will expire prior to the issuance of your IF Amendment Award for PY 2023, please contact your GOTR and use your Letter of Memorandum to convey this.
- No attachment is needed to demonstrate that your SAM is current or set to expire, as GS connects to SAM, and is part of your grant recipient profile.

# **Submission of Incremental Funding Amendment**

- Grant recipients will use GS as the approved method of requesting IF for PY 2023.
- Following are the steps for grant recipients to submit an IF amendment:
  - Once you log in to GS, you will see your grant list.
  - Next, select "Amendments." Even though there is a "Coming Soon" notice, you can still select "View Amendments."



- From the "Select Amendment Type" radio button, select "DOL Incremental Funding (Type 6)," then "Create Amendment."
- The next screen is where you complete the SF-424, SF-424A, and upload your Budget Narrative. Because GS is not centric to VETS, all other required or optional documents (i.e., Letter of Memorandum, Project Narrative, etc.), can be uploaded under "Other attachments." If a form or document has a subheading, upload it under the corresponding subheading.
- Your submission for each of these attachments will be consolidated by the system and become one PDF if you select "Original Submission" under "Print Application."
- IF amendments are due to the GOTR via GS on January 18, 2023.
- Grant recipients and GOTRs are encouraged to work together in the assembly and completion of the IF amendment application. Although not required, it is encouraged to email documents to your GOTR for review prior to submission into GS. Work with your GOTR to determine your unique business process for review and submission.
- Once an IF amendment is submitted, the document cannot be edited or retracted. Rather, it will have to be returned by the GO or National Office (NO). Returned applications will revert to an unsubmitted status until revised and resubmitted.

# COA

- COA means the GO approved the award with certain conditions that must be met within a predetermined amount of time. Grantees not meeting the conditions and timeline for submission run the risk of impacting their funding.
- Grants operating in PY 2022 may have been assigned COA by the GO that are processing because of the transition to GS. Every effort should be made to be responsive in resolving the GO-assigned conditions by adhering to the instructions within the issued COA notice, and ensuring you are not making other errors that could result in conditions for your PY 2023 award.
- To reduce some common reasons for GO 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, clearly relayed, are allowable, and that the figures in the Budget Narrative, the SF424A, and the SF424 match and that the math is correct. There are a several documents that cite the same information. It is encouraged to develop a review checklist and have multiple levels of review to ensure you have an acceptable product that will not result in a return or conditions.
  - If your program uses the De Minimis rate, ensure your program is properly accounting for its MTDC. If you have questions, work with your GOTR who will work with the NO as it relates to your specific Indirect Cost allocation methods.
  - Make sure your NICRA or CAP is current. If not, describe in the Letter of Memorandum the program's efforts to update this rate.
- Ensure you reference the updated <u>2 CFR 200 Uniform Guidance</u>.



#### **Questions and Answers**

#### Q: Can the grantee request less than the initial grant funding amount?

- A: The policy guidance indicates you cannot exceed the amount in your abstract. If you want to request less than what was included in the abstract amount for your second or third PY, it must be reflected in your budget and a justification must be included in your Letter of Memorandum. Work with your GOTR to discuss the potential of budget revisions so your funding can remain at the ceiling cited in your abstract.
- Q: The SF-424 on grants.gov expired on December 31, 2022. Is there a new version grantees should use?
- A: Forms are updated as the government mandates. Once Office of Management and Budget (OMB) has approved the latest version of the SF-424, it will be updated. At this time, continue to use the existing form until the new version is available.
- Q: On December 30, 2022, we submitted an Indirect Costs Proposal to the OCD. Should we include that entire proposal as an attachment to the Incremental Funding Application?
- A: Documentation of efforts to secure an updated or initial provisional rate must be submitted if you are going to claim Indirect Costs and should also be mentioned in the Letter of Memorandum. Work with your GOTR to determine if the entire proposal should be submitted.
- Q: If we are going to submit a budget modification because we are trying to add another staff member to the program, do we submit the Incremental Funding Application first, followed by the budget modification, or the other way around?
- A: If you are looking at PY 2022 funding to change the staffing compensation, and that staffing compensation will carry over to determine your budget for PY 2023, they are standalone amendments, and your IF request will be a budget request for the money you will receive in PY 2023. When you submit either one, be sure you have some degree of consistency. This also depends on when you want it to take effect. The IF requests will take effect in PY 2023. If you are looking to do a budget modification to make changes earlier, this will need to be taken into consideration. Work with your GOTR to determine what makes sense in your situation.
- Q: I am working on uploading our IF request in GS. There is no place for the Indirect Cost Rate to be uploaded, nor a place for the Letter of Memorandum to be uploaded as the "Other attachments" says "N/A." Your slides show the option to upload under that section. Is this an error?
- A: This issue should be corrected.

#### Q: How do you fill out the SF-424 and SF-424A?

A: On the amendment page, select "Enter Online" next to each respective document to launch the forms.



- Q: Who do I follow up with if GS shows I have no amendments found under our grant?
- A: Please follow up with your GOTR, who will work with the NO for a resolution. There could have been an issue with the transition from E-Grants to GS.

# Q: Our GS page indicates a total of \$971,000 in funding. We have two HVRP grants totaling \$973,550. Is there a reason for this?

- A: Any errors that you find in GS as it pertains to your award should be brought forward to your GOTR. If there is an error that should be corrected that could impact the IF for your second or third program year, it will be addressed immediately.
- Q: The GS page for uploading does not appear to allow for two grants. Is there another place to check, or is this an error?
- A: If you are submitting an IF amendment for each grant project, you would not do multiple IF amendments for multiple grants under one program. Each application is unique to the program you are applying for.
- Q: The third year of our grant ends on June 30, 2023. Do we need to complete the IF packet, or apply for the FOA when it is posted?
- A: If your POP ends June 30, 2023, you will apply for a new three-year grant once the FOA is released.
- Q: Our grant is not listed in GS. What do we do?
- A: Immediately contact <u>HVRP@dol.gov</u> and your GOTR to ensure your account is in GS. The NO can account for all active grants, so this may be an accessibility issue for the grant recipient staff.
- Q: The directions in the TAG say to put the FOA under which the grant recipient originally applied. On the online form, it says "N/A" and we are not able to enter anything. What should we do?
- A: The fact this cannot be entered is an oversight, as a holdover from the previous form. Your profile allows the NO to identify the FOA you were awarded under, so no action is needed.

#### Q: Who do we follow up with if we have no amendments?

- A: Work directly with your GOTR to troubleshoot this issue.
- Q: What do we enter on line 14 of the SF-424? This is for "Areas Affected by the Project," and it says to "Choose file."
- A: You can upload an attachment that indicates your service delivery area, and reference it in your abstract.

#### Q: If we need another increment of funds, as stated in our abstract, when is the due date?

A: The is the IF Amendment Application and is due January 18, 2023.



# Conclusion

- IF amendments are due to your GOTR on January 18, 2023. Now is the time to proactively review GS accessibility and ensure your grant is visible.
- The NO can provide technical guidance as it pertains to the GO Memorandum. GS can help with the GS system itself. Be sure to use the GS Helpdesk, as inquiries allow them to help you and the program if there are universal issues.
- Please forward your questions through your GOTR, who will provide an answer or forward it through your regional office to be addressed.
- Remember your GOTR, regional staff, and the NO are here for you to work through the IF funding process using GS.