

# Homeless Veterans' Reintegration Program (HVRP) Bidders' Conference December 14 and 19, 2023 Questions and Answers (Q&A)

**Disclaimer:** These questions and answers are based on historical Funding Opportunity Announcement (FOA) guidance. Using information from past FOAs is an excellent starting point when preparing to apply for the current HVRP grant. The 2024 FOA will have complete and upto-date information. Please review the 2024 FOA in length before applying.

### Overview

The following Q&A document provides responses to questions posed at the HVRP Bidders' Conference held on December 14, 2023, and December 19, 2023. Questions have been synthesized for clarity.

### **Questions and Answers**

### Eligible applicants

- 1. Q: Can a for-profit organization apply?
  - A: Historically (as stated in the 2023 FOA), for-profit organizations are eligible to apply for the HVRP grant.
- 2. Q: Are non-profits eligible to receive their full federally negotiated indirect rate if awarded an HVRP grant?
  - A: 2 Code of Federal Regulations (CFR) 200.414(c)(1) requires that all federal awarding agencies accept the negotiated rate. The FOA requires applicants to provide their most recently approved agreement if requesting indirect costs based on a Negotiated Indirect Cost Rate Agreement (NICRA) or Cost Allocation Plan (CAP) approved by your federal Cognizant Agency.

# **3.** Q: Can a non-profit applicant have a for-profit partner when applying for the grant?

A: One organization must apply for the HVRP grant. This organization's name, employer identification number (EIN), and unique entity identifier (UEI) must appear on the Standard Form (SF)-424. If selected for an award, the applicant is responsible for complying with all federal award requirements, per 2 CFR 200.300(b). The applicant/recipient may partner with other organizations, which may include forprofit entities, to support the successful reintegration of veterans experiencing homelessness into the labor force.

Applicants may propose in their application under the project and budget narrative that they plan to have a partner classified as a contractor or subrecipient. Guidance in determining the categorization may be found at 2 CFR 200.331. The applicant/recipient is responsible for determining a partner's classification as a



contractor or subrecipient, if applicable. The applicant should describe and categorize the proposed partnerships in their project narrative.

The Uniform Guidance stipulates that the classification of a subrecipient must be based on function and substance per the criteria outlined in 2 CFR 200.331. A subrecipient may not earn or keep any profit resulting from federal financial assistance unless explicitly authorized by the terms and conditions of the federal award, per 2 CFR 200.400(g). The HVRP terms and conditions do not authorize recipients or subrecipients to earn or keep a profit. A recipient is responsible for ensuring a subrecipient's services exclude profit.

### 4. Q: Are non-profits that serve all veterans regardless of discharge status eligible?

A: If an organization is otherwise eligible to receive the HVRP grant, this eligibility would not be affected if they currently serve veterans of all discharge statuses (including dishonorable) through other funding means. However, to enroll a veteran in HVRP services and provide resources using HVRP grant funds, they must have received a discharge or release under conditions other than dishonorable.

### 5. Q: Is there an audit needed to apply for this grant?

A: No, there is no requirement for an organization to complete an audit to apply for or receive the HVRP grant.

# 6. Q: Is System for Award Management (SAM) registration required to complete the grant application?

A: Yes. Applicants are required to register with the SAM before submitting an application for HVRP. The recipient must always maintain an active SAM registration with current information when they have an application under consideration or an active federal award. You can find more information about how to register with SAM at <u>https://www.sam.gov</u>.

### 7. Q: If you have two HVRP grants, are you eligible to apply for a third?

A: The number of HVRP grants an applicant has been awarded or the number of grants the applicant is actively operating is not included in the eligibility criteria under the FOA. If the entity meets the eligibility criteria in accordance with section III.A. of the 2024 HVRP FOA, the entity may apply.

#### 8. Q: Is there a minimum number of participants that must be served each year?

A: No, there is no stated standard minimum number of participants that must be served by HVRP each year. However, organizations must define numeric goals for performance indicators in their application, which includes the "number of participant enrollments." Applicants must propose performance goals, including how many veterans they will enroll and serve, that are realistic, programmatically aligned, and supported by current evidence about the extent of the need for services in the proposed service delivery area. These goals should also align with the resources requested in the proposed budget narrative.

### 9. Q: Can you apply for both HVRP and the Incarcerated Veterans' Transition Program (IVTP)?

A: Applicants may submit more than one application for different service delivery areas. If the application's service delivery areas and Continuum(s) of Care (CoC) overlap, the applicant must identify the need and specify how the areas being served will not result in a duplication of service.

## Finding an HVRP Grantee

### 10. Q: Is there a list of recent HVRP grantees?

A: Yes. NVTAC maintains a grantee map on the <u>NVTAC website</u> that offers information about all current HVRP grantees who are providing services through June 30, 2024. You can search for a grantee near you by state, county, city, and zip code.

There may be a grantee currently servicing your potential service delivery area, but that service delivery area may be available if that grantee's Period of Performance (PoP) concludes this year, or that geographic area allows for more than one HVRP grantee before reaching a high level of saturation. The Veterans' Employment and Training Service (VETS) developed a FOA 2024 <u>Service Delivery Area (SDA)</u> <u>Saturation Map</u> representing every Department of Housing and Urban Development (HUD) CoC served by HVRP grant recipients. The map includes all current HVRP grantees providing services in program year 2024 (July 1, 2024 – June 30, 2025). Each CoC is represented by a color that indicates the saturation level, which is calculated by dividing the total number of HVRP grant recipients' annual planned enrollments in the CoC by the number of veterans experiencing homelessness (VEH) in the CoC from the HUD 2023 Point-in-Time (PIT) Count.

### Veteran Eligibility.

#### 11. Q: Who is considered at risk of homelessness?

- A: To be eligible to receive HVRP services, participants must be part of at least one of several different veteran populations. The following populations include those required to meet the "at risk of homelessness" criteria:
  - 1) Veterans who, at program entry, are at risk of homelessness within 15–60 days; OR
  - 2) Veterans recently released (within the last 12 months) from incarceration who are at risk of homelessness.

To qualify as at "risk of homelessness," as this term is used above, a participant:

- 1) Must meet BOTH of the following criteria:
  - a. Has an annual income below 30 percent of the median family income for the geographical area; AND
  - b. Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or

another place defined in Category 1 of the "homeless" definition; AND

- 2) Must meet ONE of the following criteria:
  - a. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance; OR
  - b. Is living in the home of another because of economic hardship; OR
  - c. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
  - d. Lives in a hotel or motel, and the cost is not paid for by charitable organizations or by federal, state, or local government programs for low-income individuals; OR
  - e. Lives in a single room occupancy (SRO) or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
  - f. Is exiting a publicly funded institution or system of care; OR
  - g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

For more information about current participant eligibility requirements, please see the <u>HVRP Eligibility Changes Frequently Asked Questions (FAQ)</u>.

# 12. Q: Is someone who makes under 30 percent of the Area Median Income (AMI) considered at risk of homelessness?

A: Although meeting this standard is required to qualify as at risk of homelessness, an individual making under 30 percent AMI is not considered at risk of homelessness by meeting this criterion alone. Referring to question 11 above, a veteran would need to meet the criteria in sections 1 and 2 to be considered at risk of homelessness. Please see question 11 above for a review of all the requirements necessary to be determined eligible as at risk of homelessness.

# 13. Q: Are veterans who are residing in a hotel paid for by a charitable organization eligible for HVRP?

A: According to the <u>Homeless Emergency Assistance and Rapid Transition to</u> <u>Housing (HEARTH) Act</u> of 2009, an individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by federal, state, or local government programs for low-income individuals or by charitable organizations, congregate shelters, and transitional housing) is considered homeless. For more information about current participant eligibility requirements, please see the <u>HVRP</u> <u>Eligibility Changes FAQ</u>.

#### 14. Q: Can an HVRP participant be enrolled in dual federally funded programs?

A: Yes, veterans can be enrolled in multiple federally funded programs. For example, a veteran can seek assistance with employment from HVRP, Jobs for Veterans State Grants (JVSG) staff at their local State Workforce Agency (SWA), and Veteran Readiness and Employment (VR&E) at the same time, if desired. However, participant support costs should not duplicate other services a participant receives from another program (i.e., federal, state, local, etc., programs).

# 15. Q: Would individuals exiting inpatient mental health services qualify as homeless like those who are recently released from incarceration?

A: Yes. In accordance with <u>38 United States Code (USC) § 2023(2)(B)(4)(d)</u>, veterans transitioning from incarceration who qualify as homeless for HVRP are defined as a veteran who is a resident of a penal institution or an institution that provides long-term care for mental illness and is at risk of homelessness absent referral and counseling services provided under the program.

### 16. Q: What happens if a veteran has a spouse?

A: A veteran's spouse or other family members are not eligible for HVRP services. Only veterans (the definition of "<u>veteran</u>" for HVRP purposes is available in <u>Veterans' Program Letter (VPL) 02-23</u> and the <u>HVRP Eligibility Changes FAQ</u>) are eligible. The veteran's family members should be referred to other partner entities as appropriate.

#### Miscellaneous

# 17. Q: Does HVRP connect with other community partners to help veterans experiencing homelessness? Does HVRP have funding to assist with housing?

A: Yes, HVRP grantees are expected to provide enrolled veterans with critical linkages to a variety of support services available in their local communities. These services are necessary for or support their employment goal and overall stability. HVRP connects veterans with community partners at local, state, and federal levels that address a variety of needs (housing, medical care, mental health care, food, veterans' benefits, transportation, childcare, etc.). It is critical that applicants align with a diverse range of partners to ensure support services are equity-based.

Historically, the use of HVRP funds for housing assistance has been an allowable cost for recently released incarcerated veterans ONLY, with support limited to 90 days where the amount of assistance meets the rent reasonableness test. However, ONLY grantees that have explicitly included housing costs for veterans transitioning from incarceration in their approved budget narrative can expend HVRP funds for housing. Visit grants.gov for full details on what housing costs are allowable under the 2023 FOA. Please refer to the 2024 HVRP FOA when it is released for the allowability of housing costs.

# **18.** Q: Is IVTP exclusively for veterans transitioning from prison or are local jails included?

**A:** IVTP serves incarcerated veterans and/or veterans recently released from incarceration who are at risk of homelessness.

Veterans transitioning from incarceration include:

- A veteran who is a resident of a penal institution or an institution that provides long-term care for mental illness and
- Is at risk of homelessness absent referral and counseling services provided under the program.

Veterans Recently Released from Incarceration:

• To determine a veteran's eligibility for the HVRP programs, VETS considers "recently released from incarceration" to mean a veteran released from incarceration in the last 12 months who is "at risk of homelessness."

A penal institution includes federal, state, county, and city facilities such as prisons, correctional centers, detention centers, reentry centers, penitentiaries, and jails unless specified otherwise. Please see the <u>HVRP Eligibility Changes FAQ</u> for additional information on this topic.

# **19.** Q: Does HVRP provide the case managers, or does the organization applying for the grant hire the case managers?

A: The organization applying for the HVRP grant is responsible for staffing their program, including case managers, according to the personnel section of their approved budget narrative. Training and development for new HVRP staff is available at <u>NVTAC</u>, or grantees can request one-on-one technical assistance by emailing <u>contact@nvtac.org</u>.

# 20. Q: Is there a limit on what indirect casework expenses can be funded for clients receiving the employment support?

A: Costs must be consistently charged as either indirect or direct costs. <u>2 CFR</u> <u>200.403(d)</u> states a cost may not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost. For more information on indirect costs, please refer to the Indirect Cost 101 webinar conducted on June 15, 2023, on the <u>National</u> <u>Veterans' Training Institute (NVTI) website</u>.

# 21. Q: Can HVRP funds be used for residential substance abuse or mental health programs?

A: Please refer to the 2024 HVRP FOA for costs allowable under HVRP. For information on factors affecting allowability of costs, please see <u>Title 2 CFR 200.403</u>.