



## Homeless Veterans' Reintegration Program (HVRP) Quarterly Listening Session: VPL 06-24 HVRP Requirements and Functions

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## **Today's Session**



- House Rules
- Overview of VETS' Policy Guidance
- Policy Guidance for the HVRP
- VPL 06-24 HVRP Requirements and Functions Policy Rescissions
- VPL 06-24 HVRP Requirements and Functions Anatomy
- VPL 06-24 HVRP Requirements and Functions Section V. Eligibility, in depth
- Questions
- Next HVRP Quarterly Listening Session

## **House Rules**



- This session is being recorded.
- Please mute all microphones.
- Please raise your hand.
- Place all questions or comments in the "chat" for discussion at the end of the presentation, if time permits. If we do not get to your question today, it will be answered within the Q&A document provided to attendees.
- A copy of the slide deck, recording, and Q&A document will be provided to attendees within two weeks via email and will be posted on the NVTAC Quarterly Listening Session <u>website</u>.
- U.S. Department of Labor does not authorize attendees to use electronic or mechanical recording devices during this meeting.

# Overview of VETS' Policy Guidance (1 of 2)

- VETS' Veterans' Program Letter (VPL) Policy guidance about VETS programs to grant recipients. VPLs transmit program policy, implementation guidance, procedures, and other information to parties under a grant or contract agreement with VETS.
  - Can have supporting attachments such as a Technical Assistance Guide, a checklist, or other tools and resources to assist in following the VPL.
- VETS' Grant Officer's Memoranda (GO Memo) Policy notices from the Grant Officer to VETS grant recipients. They are used to communicate changes to the Terms and Conditions of the grant to ensure recipients are aware of a critical process change or in response to an emergent situation that requires some action or change.
  - Can have supporting attachments such as a Technical Assistance Guide, a checklist, or other tools and resources to assist in following the GO Memo.

# Overview of VETS' Policy Guidance (2 of 2)

- Located on the <u>VETS Active Policy Directory</u>
  - Search function available for "HVRP" to separate from other VETS' program policy guidance
- Related resources hyperlinked within the policy's subject line of the table
  - Resources for grant recipients to help understand implementing the policy for their HVRP

ţ↑	Date ↑↓	Type $\downarrow$	Number î↓	Subject	↑↓
02	2023/12/26	VPL	04-24	<u>VPL 04-24 Homeless Veterans' Reintegration Program Award Amendments (PDF)</u> Tags: hvrp, amendments Related Resource: HRVP Award Amendments Change Request Form, <u>HVRP Award Amendment Desk Guide (PDF)</u>	
03	2023/12/26	VPL	04-24 Att. A	<u>VPL 04-24 HVRP Award Amendments Attachment A- Technical Assistance Guide (PDF)</u> Tags: hvrp	
04	2023/12/18	GO	01-24	Homeless Veterans' Reintegration Program Grants – Incremental Funding Procedures for Program Year 2024 (PDF) Tags: hvrp, incremental funding, amendment, tag	
05	2023/12/18	GO	01-24 Att. 1	Attachment 1 Incremental Funding Technical Assistance Guide for PY 2024 Incremental Funding Requests (PDF) Tags: hvrp, incremental funding, tag	
06	2023/11/28	VPL	03-24	Homeless Veterans' Reintegration Program Performance, Management, and Reporting (PDF). Tags: hvrp, quarterly, performance, financial, reporting, high risk, CAP, closeout Related Resource: <u>HVRP Cash vs. Accrual Desk Aid (PDF)</u> , <u>PY23 TPR TPN Desk Guide (PDF)</u> , <u>Grantee Grant CO Webinar (nvti.or</u> <u>PDF</u> ) <b>d</b>	g,

## Active Policy Guidance for HVRP

## **HVRP Active Policy Guidance**



- VPL <u>06-24</u> Homeless Veterans' Reintegration Program Requirements and Functions
- VPL <u>04-24</u> Homeless Veterans' Reintegration Program Award Amendments
- VPL <u>03-24</u> Homeless Veterans' Reintegration Program Performance, Management, and Reporting
- Annually published GO Memo Incremental Funding Procedures for Program Year (PY) XXXX

**VPL 06-24 Homeless Veterans' Reintegration Program Requirements and Functions Policy** Rescissions

#### VPL 06-24 – HVRP Program Requirements and Functions



- Policy Rescissions These are now on the <u>Inactive Policy Directory</u>
  - GO Memo 03-23, Homeless Veterans' Reintegration Program Grants

     Reporting HVRP Grant Numbers at American Job Centers (AJC)
  - VPL 02-23, Homeless Veterans' Reintegration Program Participant Eligibility
  - VPL 03-16, Enrollment of Homeless Veterans Program Participants into a Workforce Innovation and Opportunity Act (WIOA) Workforce Program at an American Job Center (AJC)

VPL 06-24 HVRP Program Requirements and Functions Anatomy

### VPL 06-24 HVRP Requirements and Functions Anatomy – Breakdown of the VPL



Sections of VPL <u>06-24</u> are broken out by specific topics that cover:

- 1. Participant Eligibility (Section V), formerly covered in VPL 02-23
- 2. Grant Recipient Project Requirements (Section VI), formerly outlined in annual Funding Opportunity Announcements (FOA)
- 3. Participant File Maintenance and Requirements (Section VII), formerly communicated in the Terms and Conditions of the HVRP grant agreement
- 4. Functions of HVRP Staff (Section VIII), formerly outlined in annual FOAs' project design

### VPL 06-24 HVRP Requirements and Functions Anatomy – Breakdown of the VPL, continued



Sections of VPL <u>06-24</u> are broken out by specific topics that cover:

- Participant Support Costs (Section IX), formerly outlined in annual FOAs, 2 C.F.R. 200 Subpart E – Cost Principles
- 6. Incentives (Section X), formerly outlined in annual FOAs, 2 C.F.R. 200 Subpart E – Cost Principles
- 7. VETS' Monitoring of the HVRP, addressed in VPL 02-23, VPL 03-24

#### VPL 06-24 HVRP Requirements and Functions Anatomy – Section VI. Grant Recipient Project Requirements



- A. Coordination with the National Veterans' Technical Assistance Center (NVTAC)
- B. Standard Operating Procedures (SOP)
- C. Financial and Administrative Policies and Procedures
- D. Continuity of Operations Plan (COOP)
- E. Public Communications Certain Information Requirements commonly referred to as the "Stevens Amendment" see the <u>Desk Aid and Q&A</u>

#### VPL 06-24 HVRP Requirements and Functions Anatomy – Section VII. Participant File Maintenance and Requirements



- Grant recipients must maintain and make available all records and reports, including participant case records, for any activities and services described in their respective project and budget narratives, in accordance with 2 C.F.R. § 200.337.
- Grant recipients must maintain a case file for each participant that contains a participant's information, training, and services.
- Grant Officer's Technical Representatives (GOTR) conduct periodic on-site reviews during a grant recipient's period of performance (PoP) to validate data entered in the quarterly performance reports and to ensure appropriate documentation is contained within the participant's case files.
  - VPL 06-24 lists the minimum required documents in an HVRP participant's case file that must be made available for review by their GOTR

#### VPL 06-24 HVRP Requirements and Functions Anatomy – Section VII. Participant File Maintenance and Requirements, cont.



- Source documentation of veteran status
- Verification of veteran's homelessness or at risk of homelessness status
- Intake and enrollment information that includes the collection of necessary information to determine eligibility for the program
- Intake and enrollment information that includes the collection of necessary information to determine eligibility for the program

- Individual Employment Plan (IEP)
- Case notes
- Supporting financial records, invoices, and receipts for incentives and participant support costs
- Verification of Employment

# VPL 06-24 HVRP Requirements and Functions Anatomy – Section VIII. Functions of HVRP Staff



- 1. Outreach
- 2. Intake and Enrollment: Enrollment into HVRP via VETS' Grantee Reporting System
- 3. Case Management: 3 main components
  - a) Needs Assessment
  - b) Individual Employment Plan (IEP)
  - c) Employment and Supportive Services
    - i. Job Search Assistance
    - ii. Supportive Services
- 4. Collaboration
- 5. Job-Driven Training
- 6. Job Placement
- 7. Follow-Up Services

## VPL 06-24 HVRP Requirements and Functions Anatomy – Section IX. Participant Support Costs

- 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.
- 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 participants that are 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 an SOP in accordance with VPL 06-24 Section VI. B.

### VPL 06-24 HVRP Requirements and Functions Anatomy – Section IX. 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.

#### VPL 06-24 HVRP Requirements and Functions Anatomy – Section XI. VETS' Monitoring of the HVRP, the On-Site Review



- VETS monitors HVRP grant recipients' performance and compliance with policy and directives periodically throughout the PoP. VETS uses the term on-site review (OSR) to refer to both on-site and virtual monitoring.
  - VPL sets the expectations grant recipients should have for federal staff conducting the OSR, and grant recipients must work with their GOTR to complete this activity.

#### VPL 06-24 HVRP Requirements and Functions Anatomy – Section XI. VETS' Monitoring of the HVRP, Evaluating Program Costs for Financial Compliance



 VETS procured a contract to conduct audits to evaluate program costs for financial compliance with the HVRP Terms and Conditions and the Uniform Administrative Requirements, Title 2 of the Code of Federal Regulations Part 200, Subparts D and E, and Part 2900, Subparts D and E.

• The contractor is an authorized representative of VETS.

- The selection and frequency of these financial-focused audits are based on risk, considering factors such as late or inaccurate financial reporting, whether the grant recipient is on a performance-based or administrative and managerial Corrective Action Plan (CAP) or is designated as high risk, or other factors identified by the GOTR to their Regional Administrator (RAVET).
  - In most cases, there is reason to believe the grant selected will benefit from the audit as well as provide VETS with data to assist in improving current program guidance and grant recipient training.

## VPL 06-24 HVRP Requirements and Functions Anatomy – Section XII. Actions Required



- HVRP Recipients must:
  - Immediately transmit this policy to appropriate staff
  - Update and implement policies and procedures to align staff and processes with these requirements
  - Consult with the appropriate GOTR if technical assistance is needed

**VPL 06-24 HVRP Program Requirements and Functions Section V. Participant Eligibility, in Depth** 

## VPL 06-24 HVRP Requirements and Functions Section V. Participant Eligibility (1 of 9)



- Participant eligibility:
  - Provides grant recipients with a six-step flowchart to determine HVRP eligibility; this simplifies the eligibility determination process to minimize service delays.
  - Revised the criterion list for "veteran at risk of homelessness" for the veteran to meet **any** of the criteria that the HVRP defines as being at risk of homelessness, **versus the previous VPL (VPL 02-23)** having to meet a combination of criteria, which included income as a factor.
  - Maintains no-limit to the percentage of enrollment of veterans in the grant program who meet the HVRP definition of being at risk of homelessness.
  - Check out the Appendix Terms in the VPL are hyperlinked to it for reference.

## VPL 06-24 HVRP Requirements and Functions Section V. Participant Eligibility (2 of 9)



#### **Steps to Determine HVRP Eligibility**



The VPL includes tables for each step described in this chart that list the type of documentation and the documentation standards associated with each step.

## VPL 06-24 HVRP Requirements and Functions Section V. Participant Eligibility (3 of 9)



#### **Eligible Veteran:**

Active Duty – served at least one day on active duty and received a discharge or release under conditions other than dishonorable (includes time spent in basic training)

**National Guard/Reserve Members** – served at least one day of federal active duty (see 38 U.S.C. § 101(22)(23)) and received a discharge or release under conditions other than dishonorable – does not include active duty for training (e.g., Basic Training or Advanced Individual Training (AIT))

**National Guard/Reserve Members** – received a service-connected disability resulting from a disease or injury incurred or aggravated in line of duty (active or inactive duty for training) (see 38 U.S.C. § 101(24))

## VPL 06-24 HVRP Requirements and Functions Section V. Participant Eligibility (4 of 9)



#### **Documentation of Veteran Status:**

DD-214 – provides character of discharge (any one of copies 2–8)

VA Summary of Benefits letter – verifies the service-connected disability (but only for individuals who are eligible veterans as National Guard or Reserve members who received a service-connected disability resulting from a disease or injury incurred or aggravated in line of duty and were not issued a DD-214)

**Applicable military orders or NGB Form 22** – only for individuals who are eligible veterans as National Guard or Reserve members who served on federal active duty and **were not issued a DD-214;** the individual must self-attest their federal active-duty character of discharge

#### **VPL 06-24 HVRP Requirements and Functions** Section V. Participant Eligibility (5 of 9)



#### **Categories of HVRP Eligibility:**

#### **Veterans Experiencing Homelessness**

This includes:

- Veterans who were homeless but found housing during the 60-day period preceding the date of HVRP enrollment
  Veterans who are **at risk of homelessness** within 15–60 days from the date of HVRP enrollment (veterans who are at risk of homelessness within 14 days are considered at "imminent risk" and are defined as homeless)

#### Veterans Participating in a Partner Program

This includes:

- Housing and Urban Development Veterans Affairs Supportive Housing (HUD-VASH) or Tribal HUD-VASH
- Native American Housing Assistance and Self Determination Act of 1996
- Supportive Services for Veterans Families (SSVF) (Rapid Re-Housing (RRH) or Prevention)

#### **Veterans Transitioning from Certain Institutions**

This includes:

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

#### Veterans At Risk of Homelessness

This includes:

- Veterans who meet the criterion for extremely low income
- Veteran Recipients of Welfare and/or Public Assistance
- Referred from specific VA Programs (See VPL 06-24 Appendix)
  Veterans who are at risk of losing their current housing (See VPL 06-24 Appendix)

#### VPL 06-24 HVRP Requirements and Functions Section V. Participant Eligibility (6 of 9)



#### **Documentation of Homelessness Status:**

**Eviction notice** 

Foreclosure notice

Record of shelter stay

Homeless street outreach provider or referral source (e.g., local law enforcement agency) letter

Other information relevant to the veteran's homelessness situation, or documentation the veteran was recently housed (60 days preceding the date of HVRP enrollment)

#### **Documentation of Participation in a Partner Program:**

Documentation from partner program to support the veteran's eligibility status

**Documentation of Transitioning from Certain Institutions:** 

Examples of documentation for transitioning from certain institutions include exit documentation from an institution

### VPL 06-24 HVRP Requirements and Functions Section V. Participant Eligibility (7 of 9)



**Documentation of At Risk of Homelessness Status:** 

**Eviction notice** 

Income statement

**Referral from Partner Program** 

Welfare or Public Assistance documentation

Other information relevant to the veteran's "at risk of homelessness" situation meeting the criteria outlined in the "at risk of homelessness" definition

### VPL 06-24 HVRP Requirements and Functions Section V. Participant Eligibility (8 of 9)



**At Risk of Homelessness redefined for HVRP:** For a veteran to be considered "at risk of homelessness" for HVRP services, the veteran must meet at **least one of the criteria below.** 

#### **At Risk of Homelessness Criterion:**

**Veterans who meet the criterion for extremely low income:** HUD sets family income limits for its housing programs, including an extremely low income (ELI) limit – see <u>HUD Income Limits</u>

**Veteran Recipients of Welfare and/or Public Assistance:** VETS defines the recipient as an individual who, during the program year, receives or is a member of a family who receives, cash, welfare, or public assistance payments under a federal, state, or local program

#### **Referred from the following VA Programs:**

Substance Use Residential Rehabilitation Treatment Program Domiciliary Residential Rehabilitation Treatment Programs (DRRTP) Veterans Justice Outreach Program – VA Homeless Programs Post-Traumatic Stress Disorder (PTSD) Residential Rehabilitation and Treatment Program Compensated Work Therapy/Transitional Residence Programs

### VPL 06-24 HVRP Requirements and Functions Section V. Participant Eligibility (9 of 9)



**At Risk of Homelessness redefined for HVRP:** For a veteran to be considered "at risk of homelessness" for HVRP services, the veteran must meet at **least one of the criteria below.** 

#### At Risk of Homelessness Criterion Continued:

**Veterans who are at risk of losing their current housing** with no alternative safe housing options immediately available to prevent them from moving to an emergency shelter or another place described in the homeless definition (i.e., will enter emergency shelter, including Emergency Housing Assistance or Safe Haven, transitional housing, or a place not meant for human habitation)

## Questions



# What questions do you have regarding this new guidance?

## **Next HVRP Quarterly Listening Session**



Be on the lookout for an invitation for a February 2025 Quarterly Listening Session in the coming months. Topics will include:

- PY25 Incremental Funding (IF) Applications
  - The GO Memo directing grant recipients to submit IF applications will be published in December
- Check in on implementation of VPL 06-24
- FY25 FOA status update

# Thank you!