

### **VETERANS' PROGRAM LETTER NO. 06-24**

TO: ALL VETERANS' EMPLOYMENT AND TRAINING SERVICE (VETS) HOMELESS VETERANS' REINTEGRATION PROGRAM GRANT RECIPIENTS ALL VETS STAFF FROM: J. MARGARITA DEVLIN

FROM: J. MARGARITA DEVLIN Deputy Assistant Secretary

SUBJECT: Homeless Veterans' Reintegration Program Requirements and Functions

#### I. Purpose

This Veterans' Program Letter (VPL) provides guidance on all mandatory program requirements and functions to all Homeless Veterans' Reintegration Program (HVRP) grant recipients.

#### **II.** References

A. 38 United States Code (U.S.C.) Chapter 20, as amended, specifically:

- 1. 38 U.S.C. § 2021, Homeless Veterans' Reintegration Programs
- 2. 38 U.S.C. § 2021A, Homeless Women Veterans and Homeless Veterans with Children reintegration grant program
- 3. 38 U.S.C. § 2023, Referral and Counseling Services: Veterans at Risk of Homelessness who are Transitioning from Certain Institutions
- B. 42 U.S.C. § <u>11302</u>, Section 103 of the McKinney-Vento Homeless Assistance Act: General Definition of Homeless Individual, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009
- C. 42 U.S.C. § <u>1437f(o)</u>, HUD-VA Supportive Housing (HUD-VASH) program and Tribal HUD-VASH program
- D. 25 U.S.C. § <u>4101</u> et seq., Native American Housing Assistance and Self Determination Act of 1996
- E. 38 U.S.C. § 2044, Veterans Affairs Rapid Re-Housing and Prevention Program

- F. <u>2 Code of Federal Regulations (C.F.R.) § 200.328</u> Financial Reporting and <u>§ 200.329</u>, Monitoring and Reporting Program Performance
- G. <u>2 C.F.R. Part 2900</u>, DOL-Specific Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- H. VPL 04-24, Homeless Veterans' Reintegration Program Award Amendments
- I. <u>VPL 03-24</u>, Homeless Veterans' Reintegration Program Performance, Management, and Reporting, dated November 28, 2023
- J. Terms and Conditions attached to each HVRP grant award

### **III. Rescissions**

- A. <u>GO Memo 03-23</u>, Homeless Veterans' Reintegration Program Grants Reporting HVRP Grant Numbers at American Job Centers (AJC)
- B. VPL 02-23, Homeless Veterans' Reintegration Program Participant Eligibility
- C. <u>VPL 03-16</u>, Enrollment of Homeless Veterans Program Participants into a Workforce Innovation and Opportunity Act (WIOA) Workforce Program at an American Job Center (AJC)

#### **IV. Background**

The U.S. Department of Labor (DOL) Veterans' Employment and Training Service (VETS) works in coordination with DOL Employment and Training Administration's (ETA) Office of Grants Management (OGM) for the administration of VETS' competitive grant programs.

VETS funds three types of competitive grants on a three-year period of performance (PoP) categorized as: HVRP, which serves all eligible populations; the Incarcerated Veterans' Transition Program (IVTP), exclusively for justice-involved veterans and veterans transitioning from certain institutions; and the Homeless Women Veterans and Homeless Veterans with Children Reintegration Grant Program (HWVHVWC), exclusively for homeless women veterans and homeless veterans with <u>children</u>. Collectively, these programs are referred to as HVRP and this guidance is applicable to all three categories.

VETS developed this guidance for grant recipients to be successful in understanding the functions and requirements of the program. HVRP is an employment-focused, competitive federal grant program intended to enable veterans experiencing homelessness or at risk of homelessness the ability to reach their full employment potential and obtain high-quality career outcomes. HVRP grant recipients must address the complex employment-related requirements and supportive services necessary to meet the needs of this population.

Grant recipients are required to implement the HVRP grant in accordance with their approved award. The approved project and budget narratives for their HVRP project documents how the grant recipient will execute the program. Changes to a grant recipient's HVRP award shall only be made in accordance with <u>2 C.F.R. § 200.308</u> and <u>VPL 04-24</u>,

Homeless Veterans Reintegration Program Award Amendments, or the most current guidance on amendments.

Through direct services, a robust referral system, or a hybrid approach, grant recipients will provide job placement, job training, job development, career counseling, and resumé preparation services, among other services, to assist the veteran in overcoming barriers to employment and be successful in the labor force. HVRP grant recipients must also provide participants with follow-up services to increase their likelihood of success in employment and retention.

Throughout this policy, certain key terms are hyperlinked directly to the corresponding definition provided in the <u>Appendix</u>.

## V. Eligibility

This section establishes the criteria for participant eligibility for HVRP.

HVRP provides services to veterans experiencing homelessness or at risk of homelessness.

### A. Categories of HVRP Eligibility

According to <u>38 U.S.C. § 2021</u>, <u>veterans</u> served by this program include the following categories:

- 1. <u>Homeless</u> veterans, including:
  - A. Veterans who were homeless but found housing during the 60-day period preceding the date of HVRP enrollment; and
  - B. Veterans who, at the time of enrollment in HVRP, are <u>at risk of homelessness</u> within the next 60 days;
- Veterans participating in the Department of Housing and Urban Development (HUD)-Department of Veterans Affairs (VA) supported housing program for which rental assistance is provided pursuant to section 8(o)(19) of the United States Housing Act of 1937 (<u>42 U.S.C. § 1437f(o)(19</u>)) or the Tribal HUD-VA Supportive Housing (Tribal HUD-VASH) program;
- 3. Veterans who are receiving assistance under the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. § 4101 et seq.);
- 4. Veterans described in <u>38 U.S.C. § 2023(d)</u> or any other veterans who are transitioning from being incarcerated; and
- 5. Veterans participating in the VA rapid rehousing and/or prevention program authorized in <u>38 U.S.C. § 2044</u>.

Annual appropriation acts may authorize HVRP grant recipients to serve other veteran populations at risk of homelessness. Continued service to these individuals is contingent upon future appropriation act authorization. HVRP grant recipients are responsible for

consulting with their Grant Officer's Technical Representative (GOTR) and reviewing the appropriation act each year to ensure recipients are serving only eligible populations. At the time of publication of this VPL, Congress has authorized HVRP grant recipients to serve the following population:

• Veterans recently released from incarceration who are <u>at risk of homelessness</u>.

## B. Identifying and Verifying Eligibility Status

To participate in HVRP, an individual must be a <u>veteran</u> and either experiencing <u>homelessness</u> or at risk of homelessness or participating in a <u>qualifying partner service</u>, or <u>transitioning from certain institutions</u> and in need of or would benefit from employment services. To provide HVRP services, grant recipients must collect, in an individual's participant case file, source documentation of eligibility. This section lays out a six-step process for determining eligibility for the purposes of HVRP.

## **Step 1: Identify Veteran Status**

**Veteran Status.** The term "<u>veteran</u>" is defined in <u>38 U.S.C. § 101(2)</u>. To document the participant's veteran status, the case file must include a DD-214 that provides the character of discharge (any one of copies 2–8) or other acceptable forms of documentation as described below:

- For individuals who are eligible veterans under HVRP as National Guard or Reserve members who did not serve on federal active duty, but received a serviceconnected disability resulting from a disease or injury incurred or aggravated in line of duty per <u>38 U.S.C. § 101(24)</u> and were not issued a DD-214, the grant recipient must obtain a copy of the VA Summary of Benefits letter to verify eligibility.
- For individuals who are eligible veterans under HVRP as National Guard or Reserve members who served on federal active duty (does not include inactive or active duty for training) and were not issued a DD-214, the grant recipient must obtain a copy of the applicable military orders or NGB Form 22 to verify eligibility.

Please see the <u>Appendix</u> for additional details pertaining to eligibility requirements.

To expedite services, VETS allows grant recipients to conditionally enroll, provide services to, and report veteran participation on the quarterly performance reports using two alternative source documents:

- Veterans Benefits Management System (VBMS) documentation, which recently replaced the VA Hospital Inquiry (HINQ); or
- VA web application Status Query and Response Exchange System (SQUARES) documentation.

Both VA inquiry systems are free of charge. Each grant recipient must request their own access to these systems by following the <u>instructions</u> in the <u>Appendix</u>.

While it is acceptable for grant recipients to conditionally enroll participants using these alternative source documents, they must request a copy of the DD-214 (or the VA Summary of Benefits letter or military orders, *only under the conditions detailed above*) within three business days of enrollment. The grant recipient must include proof of the timely request for the veteran status eligibility documentation in the participant case file with the alternative source documents.

It is the grant recipient's responsibility to follow up on requests for the veteran status eligibility documentation. If grant recipients need technical assistance regarding how to request these documents, they must contact their GOTR. The veteran status eligibility documentation must be included in the participant case file. If documentation received determines the participant is ineligible, expenditures for participant support costs or incentive costs for the individual may be considered unallowable, and grant recipients must immediately remove the individual from the HVRP performance reports. If the grant recipient has requested the eligibility documentation within three business days of enrollment, followed up on the request, and made reasonable efforts to obtain the documentation, but does not receive the appropriate eligibility documentation to verify the veteran status by the time the participant exits, the grant recipient must reach out to their GOTR for technical assistance on how to proceed, if that rare circumstance arises.

The definition of a veteran may be different for other programs (e.g., Supportive Services for Veteran Families [SSVF] and Grant and Per Diem [GPD]), so HVRP grant recipients must verify <u>veteran</u> status first under HVRP. If the individual meets the HVRP definition of veteran, go to Step 2.

Type of Documentation	Documentation Standards
<ul> <li>DD-214 that provides character of discharge (any one of copies 2–8).</li> <li>VA Summary of Benefits letter to verify the service-connected disability (<i>but only for</i> 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 not issued a DD-214).</li> <li>Applicable military orders or NGB Form 22 (<i>but only for</i> individuals who are eligible veterans as National Guard or Reserve members who served on federal active duty and not issued a DD-214). The individual must self-attest their federal active-duty character of discharge.</li> </ul>	Include the DD-214 (or VA Summary of Benefits or military orders, <i>only under the</i> <i>conditions detailed above</i> ) in the participant's case file. The DD-214 (or VA Summary of Benefits or military orders, <i>only under the conditions detailed above</i> ) must be requested (through the participant or other applicable entities/resources) within three business days of enrollment and must be included in the participant case file. VBMS or SQUARES documentation are only acceptable as provisional source documents to expedite enrollment.

## **Table 1: Documentation of Veteran Status**

## **Step 2: Identify Homelessness Status**

**Homelessness Status.** The term "homeless veteran" means a veteran who is experiencing homelessness (defined in subsection (a) or (b) of section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. § 11302)). In accordance with <u>38 U.S.C. § 2021</u>, this includes veterans who were homeless but found housing during the 60-day period preceding the date of HVRP enrollment. Grant recipients are required to document the participant's circumstances of homelessness.

If the individual meets the HVRP definition of a <u>veteran</u> and experiencing <u>homelessness</u>, go to Step 6. If not, got to Step 3.

Type of Documentation	Documentation Standards
Examples of homelessness documentation include eviction notice, foreclosure notice, record of shelter stay, homeless street outreach provider or referral source (e.g., local law enforcement agency) letter, and other information relevant to the veteran's homelessness situation, or documentation the veteran was recently housed (60 days preceding the date of HVRP enrollment).	Include documentation to justify the determination of homelessness status in the participant's case file. Some circumstances of homelessness, such as a veteran living in a car, park, abandoned building, bus or train station, airport, or campground, will not have documentation to provide; these circumstances must be documented within the participant case file. If no documentation exists, self-attestation can be used in these circumstances to document a participant's homelessness status.

## Table 2: Documentation of Homelessness Status

# Step 3: Identify Participation in a Partner Program

If the individual meets the HVRP definition of a <u>veteran</u> and is participating in the partner services below, go to Step 6. If not, got to Step 4. Qualifying partner services consist of one of the following:

- a. HUD-VASH or Tribal HUD-VASH,
- b. Native American Housing Assistance and Self Determination Act of 1996, or
- c. SSVF (Rapid Re-Housing (RRH) or Prevention).

## Table 3: Documentation of Participation in a Partner Program

Type of Documentation	Documentation Standards
Documentation from partner program to support the veteran's eligibility status.	Include documentation of participation in a partner program in the participant's case file.

## **Step 4: Identify if Transitioning from Certain Institutions**

If the individual meets the HVRP definition of a <u>veteran</u> and is <u>transitioning from certain</u> <u>institutions</u> or any other veterans who are transitioning from being incarcerated, go to Step 6. If not, got to Step 5.

Type of Documentation	Documentation Standards
Examples of transitioning from certain institutions documentation include exit documentation from an institution.	Include documentation of transitioning from certain institutions in the participant's case file.

### **Table 4: Documentation of Transitioning from Certain Institutions**

## Step 5: Identify At Risk of Homelessness Status

If the individual meets the HVRP definition of a <u>veteran</u> and is <u>at risk of homelessness</u>, go to Step 6. If the individual does not meet any of the definitions at this step or steps 2–4 above, the individual is not eligible for HVRP.

The following eligibility categories require meeting the "at risk of homelessness" definition:

- 1. 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); and
- 2. Veterans recently released (within the last 18 months from the date of HVRP enrollment) from incarceration who are at risk of homelessness.

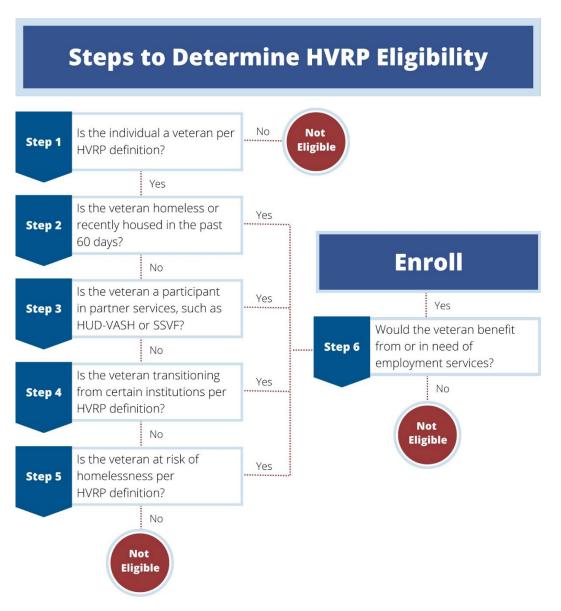
## Table 5: Documentation of At Risk of Homelessness Status

Type of Documentation	Documentation Standards
Examples of at risk of homelessness documentation include eviction notice, income statement, referral from certain VA programs, welfare or public assistance documentation, and other information relevant to the veteran's "at risk of homelessness" situation, meeting the criteria outlined in the " <u>at risk of</u> <u>homelessness</u> " definition.	Include documentation to justify the determination of at risk of homelessness status in the participant's case file. If no documentation exists, self-attestation can be used in rare circumstances to document a participant's "at risk of homelessness" status.

## **Step 6: Needs or Would Benefit from Employment Services**

HVRP is an employment program; a veteran who meets the eligibility requirements should not automatically be enrolled in HVRP. The veteran must need employment services (i.e., unemployed or underemployed seeking meaningful employment earning

livable wages); otherwise, they should not be enrolled in HVRP. There are a variety of reasons why a veteran who meets all the eligibility requirements for HVRP may not be a good fit for the program. A good assessment process will help with that decision and must be documented within the participant file.



The following flow chart depicts this six-step process:

# VI. Grant Recipient Project Requirements:

The grant recipient's HVRP project must meet all requirements as outlined in the terms and conditions of the award. For any award year, the following specific requirements apply:

#### A. Coordination with the National Veterans' Technical Assistance Center

VETS funds the National Veterans' Technical Assistance Center (NVTAC). NVTAC provides training and technical assistance on veterans' homelessness issues to grant recipients, employers, veteran service organizations, and agency partners. There is no cost to HVRP grant recipients for NVTAC services. HVRP grant recipients are highly encouraged to participate in NVTAC training and technical assistance activities during their PoP, and they can request training and technical assistance based on their needs. All HVRP grant recipients receiving an award beginning in Program Year 2024 **must** contact NVTAC (via email at <u>contact@nvtac.org</u>) to schedule and complete an introductory consultation within the first quarter of their three-year PoP. HVRP grant recipients that received their awards prior to Program Year 2024 are encouraged to contact NVTAC to schedule a consultation. Grant recipients are **required** to participate in NVTAC training and technical assistance activities when required by the GOTR.

For more information on the services NVTAC provides to grant recipients, please visit the <u>New Grantees section</u> of the NVTAC website.

#### **B.** Standard Operating Procedures (SOP)

Grant recipients must maintain written procedures, i.e., SOPs, to ensure participant support costs and participant incentive costs are implemented and executed consistently and that the associated expenditures meet the requirements in 2 C.F.R. 200.302(b)(7), the FOA, and the terms and conditions.

Grant recipients using HVRP funds for incentives must have an SOP in place that outlines a disbursement policy and tracking system to ensure supportive services are implemented and executed consistently before incentives are dispersed. An SOP on incentives must describe the following:

- 1. Identification of the amount(s) and type(s) of incentives;
- 2. Criteria for participant issuance;
- 3. Assurance that incentives will not be provided to participants for entertainment, such as movie tickets, sporting event tickets, or other entertainment purposes, and will not be used to purchase alcohol, e-cigarettes, e-liquids, tobacco, etc.
- 4. Authorization process for a transaction;
- 5. Receipt and custody of the asset;
- 6. Recording and reporting activity related to that asset;
- 7. Process for taking periodic inventory and reconciling balances; and
- 8. Segregation of duties, such as:

- a. Requiring limited access to cards and who can handle, etc.
- b. Having managers or staff from the program offices perform specific cashrelated functions.
- c. Requiring two authorizing signatures on checks issued.
- d. Requiring supervisory approval for each use of vouchers.
- e. Verifying usage and balances of logs through management information system reports.

The use of a participant support cost is determined on an individual basis, and the grant recipient is required to have an SOP describing the justification of the cost to the HVRP program, how costs will be documented, and the procedures for issuing payment. See Section IX., Participant Support Costs for more details.

Participant support costs support the reintegration of enrolled HVRP participants back into the labor force. The expenses must be reasonable and necessary to enable an individual to participate in a training program, and a grant recipient must have an SOP in place for expending funds on such costs.

Examples, templates, and resources for developing SOPs can be found in the HVRP <u>Resources</u> section of NVTAC's website.

## C. Financial and Administrative Policies and Procedures

Grant recipients are required to comply with the citations associated with each internal control activity listed below, ensuring maintenance of the required written financial and administrative policies and procedures:

- Payments (<u>2 C.F.R. § 200.302(b)(6)</u> and <u>2 C.F.R. § 200.305</u>)
- Allowable costs (<u>2 C.F.R. § 200.302(b)(7)</u> and <u>2 C.F.R. § 200.403</u>)
- Procurement Standards (<u>2 C.F.R. § 200.318</u> through § 200.320)
- Competition (<u>2 C.F.R. § 200.319</u>)
- Methods for procurement to be followed (<u>2 C.F.R. § 200.320</u>)
- Compensation personal services and fringe benefits (<u>2 C.F.R. § 200.430</u> and <u>2 C.F.R. § 200.431</u>)
- Employee relocation costs (<u>2 C.F.R. § 200.464</u>)
- Travel costs (<u>2 C.F.R. § 200.475</u>)

### D. Continuity of Operations Plan (COOP)

Grant recipients are required to submit their COOP to the GOTR no later than 120 days after receiving their initial Notice of Award at the beginning of their three-year PoP. The COOP ensures grant recipients have a plan to continue performance under a broad range of circumstances, including but not limited to localized acts of nature, accidents, and technological or attack-related emergencies. The COOP should include the necessary information and steps or actions pertaining to elements such as orders of succession, delegation of authority, communications, continuity of services for participants, essential functions, continuity facilities, records management, etc. Examples and resources for developing a COOP can be found in the <u>HVRP Resources section</u> of NVTAC's website.

### E. Public Communications – Certain Information Requirement

Annual appropriations acts include a requirement that recipients of federal funds disclose certain **information** when issuing statements, press releases, requests for proposals, bid solicitations, and other documents describing projects or programs funded, in whole or in part, with federal money (commonly referred to as the "<u>Stevens Amendment</u>"). These documents must clearly state:

- 1. The percentage of the total costs of the program or project which will be financed with federal money;
- 2. The dollar amount of federal funds for the project or program; and
- 3. The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.

VETS conducts regular monitoring of HVRP grant recipients' performance and compliance with policy and directives periodically throughout the PoP (see Section XI). VETS uses this opportunity to also monitor compliance with the Stevens Amendment.

#### 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 <u>2 C.F.R. § 200.337</u>. The quarterly performance report requires the collection and reporting of participant information (see VPL 03-24 or the most current guidance on quarterly reporting). Grant recipients must maintain a case file for each participant that contains a participant's information, training, and services. GOTRs conduct periodic on-site reviews during a grant recipient's PoP to validate data entered in the quarterly performance reports and to ensure appropriate documentation is contained within the participant's case files.

At a minimum, an HVRP participant's case file must include the following documents:

1. Source documentation of veteran status (see Section V.B. and the <u>Appendix</u>);

- 2. Verification of veteran's homelessness, participation in partner program, transitioning from certain institutions, or at risk of homelessness status (see Section V.B. and the <u>Appendix</u>);
- 3. Intake and enrollment information that includes the collection of necessary information to determine eligibility for the program;
- 4. An assessment that may include education, skills, employment history, desired career, and employment barriers;
- 5. Individual Employment Plan (IEP) that includes developmental services or steps required to reach goals and overcome all employment barriers, along with accomplishments made by the individual;
- 6. Case notes documenting activities such as contact with the participant, services provided, training, and referrals to other agencies to assist the participant to gain/retain meaningful employment;
- 7. Supporting financial records, invoices, and receipts for incentives and participant support costs<sup>1</sup> incurred for the participant spent in accordance with the grant recipient's budget narrative, <u>2 C.F.R. § 200 Subpart E</u>; and
- 8. Verification of Employment (through employer, participant, or automated system), wages, and hours worked for the quarter placed and during each quarter after exit during the follow-up tracking period, as established each year during the PoP (see Section VIII.F. for details).

Grant recipients must protect participants' privacy to the greatest extent possible following the steps outlined in their grant award's terms and conditions and the legal requirements contained in the FOA under which the award was issued.

## VIII. Functions of HVRP Staff

To have a successful HVRP project, grant recipients must establish partnerships and work with public, private, and nonprofit organizations, especially those that employ and partner with veterans who have experienced homelessness.

HVRP grant recipients accomplish these objectives through a variety of core services:

## A. Outreach

Grant recipients are responsible for three types of outreach and engagement activities:

1. **Participant**: Grant recipients must conduct effective outreach, recruitment, and engagement to meet participant enrollment goals. This is accomplished by using a

<sup>&</sup>lt;sup>1</sup> In accordance with <u>2 C.F.R. § 200.302(a)</u>, records documenting compliance with Federal statutes, regulations, and the terms and conditions of the Federal award, must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award.

flexible, effective, non-threatening, and persistent approach to meet veterans where they are. This means knowing the population and where to reach out to sheltered and unsheltered veterans in the Service Delivery Area (SDA). This includes reaching veterans living in encampments, such as tent cities, as well as veterans in institutional settings, such as jails and hospitals. Referrals can also come from outreach to local partners, including shelters, jails, and American Job Centers (AJC). Outreach must also allow for in-person, virtual, socially distanced, or hybrid models.

- 2. Employer: Grant recipients must proactively engage both public and private employers and conduct effective outreach to potential employers, including engagement with prevalent or growing industry sectors in the grant recipient's SDA, and in-demand jobs identified by the local Labor Market Information (LMI). This includes assessing employers' talent needs, work environments, and other factors relevant to candidate placement. Outreach includes effective methods for developing and maintaining strong relationships with employers, conducting job development activities, and carrying out job search assistance activities to develop job or training opportunities.
- 3. **Supportive Services**: Grant recipients must leverage resources by conducting outreach and coordinating with other local and national organizations and supportive service programs, including penal institutions and halfway houses, to assist HVRP participants in overcoming barriers to employment. VETS promotes collaboration with other organizations to leverage federal, state, and local resources to the maximum extent possible in support of reintegrating veterans experiencing homelessness. Grant recipients must implement effective outreach on behalf of the participant to facilitate the delivery of effective job training, soft skills training, counseling, and other wraparound services, such as the provision of housing, transportation, childcare, and necessary health services (including mental health) as the means for expediting the reintegration of eligible veterans into the labor force.

#### **B.** Intake and Enrollment

The intake process is where grant recipients obtain the necessary information on veterans seeking services. The intake process includes screening individuals to determine eligibility, collecting information from the individual to determine the types of employment-related services needed, and, if the individual is eligible and seeking employment, enrolling them into the program. This process must be documented and retained in the participant file. See Section V.B. for documentation required for eligibility.

### Enrollment into HVRP via VETS' Grantee Reporting System

The veteran is considered enrolled in HVRP once the grant recipient has collected the necessary information to determine that they are eligible for HVRP, and the participant record is created in VETS' Grantee Reporting System (VGRS). VETS requires grant recipients to record the VGRS participant and enrollment records within five business days of enrollment; this includes conditional enrollments of veterans for whom the grant recipient is reliant upon alternative source documents listed in Step 1: Identify Veteran Status.

To enroll a participant into VGRS, the grant recipient must create a participant record.

Please refer to the HVRP Quarterly Performance Report Desk Guide and VGRS Grantee Staff User Guide for participant/enrollment data entry. These resources can be found on the <u>HVRP webpage</u>.

Additionally, grant recipients must be vigilant in the maintenance of VGRS participant records to ensure they are current. Grant recipients' VGRS user accounts become inactive after 60 days of inactivity.

#### C. Case Management

Case management is a client-centered approach in the delivery of individualized career services designed to develop comprehensive employment plans for participants, assist participants to overcome barriers to employment, ensure access to the necessary training and supportive services that impart relevant skills and connect participants with high-quality career opportunities, and provide support during program participation and after job placement. HVRP case managers are essential in keeping the participant engaged in the program. Case management is a collaborative process of assessment, planning, facilitation, care coordination, evaluation, and advocacy for options and services to meet an individual's comprehensive needs through communication and available resources to promote quality, cost-effective outcomes. Case management is provided through the following activities:

- 1. Needs Assessment: The case manager collects education and employment history and identifies barriers to employment, including skill deficits, strengths, supportive service needs, and job readiness. An assessment is an ongoing process during which the case manager observes the client, records pertinent information, and identifies other sources of information. The case manager works closely with other staff and partner agencies to identify necessary referrals for shelter, clothing, food, and other immediate crisis intervention needs.
- 2. Individual Employment Plan (IEP): The IEP identifies and lays out a strategy for achieving the veteran's overall employment goal and the steps to overcome all employment barriers. That strategy includes the overall goal broken down into manageable steps, a brief description of the activities or services required, timelines for completion, and the people responsible for each action. Grant recipients must develop and document an IEP with every participant, and it must be maintained and updated in the participant's file. The IEP is considered a "living document" and must be discussed, reviewed, and updated throughout participation in HVRP. The outline for specific implementation of an IEP is:
  - a. **Start Small:** Breaking goals down into smaller, more easily accomplished components leads to early success and builds confidence.
  - b. **Promote Accountability:** Including timelines and expectations about what needs to be done, when, and by whom allows veterans and case managers to track progress and hold each other accountable.

- c. **Build Buy-In:** Developing the IEP is a collaborative process that requires negotiation and flexibility from the veteran and case manager. If the veteran is not invested in the plan, progress will be intermittent and slow, or worse. To demonstrate their commitment to the plan, the case manager and veteran should sign the IEP; this will also give the veteran the opportunity to review the document to ensure it reflects their interests in, and understanding of, the process.
- d. **Connect with Partners:** Veterans may be working with multiple providers to assist them with their job search or to address other barriers; collaborating and sharing information with those partners prevents duplication of services and ensures everyone is working together to help the veteran.
- 3. Employment and Supportive Services: VETS requires grant recipients to provide an array of client-centered services utilizing a case management approach that directly assists eligible participants and provides critical linkages to a variety of supportive services available in their local communities. Once a participant is determined eligible and enrolled into HVRP, grant recipients are required to provide needed career exploration and placement services, job-driven training, and supportive services so the veteran may secure employment in stable, high-demand occupations earning livable wages. The services provided (through direct services, referrals to partner agencies, or a hybrid approach) must assist the participant to overcome employment barriers and find and maintain meaningful employment. These services include the following:
  - a. Job Search Assistance: An activity focusing on building practical skills, identifying and initiating employer contact, and conducting successful interviews with employers. Various approaches may include job club participation, identifying personal strengths and goals, resumé and application preparation, interviewing techniques, and receiving labor market information. Job search assistance often includes self-service activities where individuals obtain information about job openings.
  - b. **Supportive Services:** Services provided to assist enrolled HVRP participants with overcoming all barriers to employment and support the reintegration back into the labor force. Examples of supportive services include, but are not limited to, transportation, healthcare, financial assistance, drug and alcohol abuse counseling and referral, individual and family counseling, job coaches, childcare and dependent care (if eligible), temporary shelter (if eligible), financial counseling, and other reasonable expenses required for participation in the training program. Supportive services may be provided in-kind or through partnerships. Please see Section IX. for details pertaining to participant support costs allowable under HVRP.

#### **D.** Collaboration

It is critical that HVRP case managers align with a variety of partners to ensure supportive services are available to the participant to address all employment barriers with a goal of coordinated service delivery. HVRP case managers must work closely with other service providers to coordinate services, ensuring services are not duplicated and creating a positive customer experience. Stable housing, health care (including mental health), transportation, childcare, and other supportive services are critical in helping veterans experiencing homelessness reintegrate into the labor force.

**Coordination with American Job Centers (AJC) Network Programs:** Because of the benefits of coordinating with multiple resources and services available to veterans experiencing homelessness, all grant recipients are strongly encouraged to refer participants to services available at a local AJC (see <u>American Job Center Finder</u> <u>Careeronestop</u>) from the Wagner-Peyser Act-funded Employment Service, a Jobs for Veterans State Grant (JVSG)-funded Disabled Veterans' Outreach Program (DVOP) specialist, or a WIOA Title I-funded program, such as those that provide training services for adults or dislocated workers. Grant recipients and the local AJC should coordinate and learn about the services that are offered to veterans. Such coordination may include HVRP grant recipient staff making a visit to the local AJC or a virtual meeting facilitated by the grant recipient to learn about services offered. GOTRs are available to facilitate such coordination. Registration alone in the state workforce system does not constitute enrollment. Participants should meet with AJC staff (in-person, virtually, or telephonically) to learn about, and receive, one or more applicable services.

Not all HVRP participants may be eligible for services from a DVOP specialist due to the different definition of veteran used across the programs. HVRP recipients should refer participants to the AJC for proper eligibility screening prior to referral to a DVOP specialist for services.

#### E. Job-Driven Training

Employment and job-training plans will be included within the IEP, as described in Section VIII.C.2. The job-training plan is based on the individual job-training needs assessment for each veteran. Job-driven training is targeted to the specific industries, occupations, and skills that are in demand locally and align with the participant's employment goals. In addition to strategies to address the participant's employment goals, the job-training plan should reflect, as appropriate, other approaches to help the participant achieve self-sufficiency, including referrals to other services or programs.

Strategies described in an employment and job-training plan must focus on employment opportunities that add value and impart relevant, sought-after skills within the existing job market. Strategies should align with, and leverage, other federal, state, or local education and job-training program resources.

Job-driven training for participants may be provided directly through the grant or provided through partnerships with an AJC partner program, the GI Bill, Veteran Readiness and Employment (VR&E), State Vocational Rehabilitation (VR) programs, VA Compensated Work Therapy (CWT), or other training providers. Grant recipients and HVRP staff must be familiar with their approved project narrative; this ensures that the grant recipient develops a participant training plan and implements it either through direct training or a robust referral system. Job-driven training must enable a participant to become employable or seek a higher grade of employment and must align with the participants' employment goals. Some examples of job training that may be provided to participants are on-the-job training (OJT); apprenticeships; customized job training, upgrading, or retraining; entrepreneurial or other work-based learning; and occupational skills training provided by the grant recipient or a third-party training provider.

HVRP career services (defined in the <u>HVRP Glossary of Terms</u>), such as life skills, financial management, resumé writing, interview preparation, and other job readiness or preparation services, **are not considered** job-driven training and must not be recorded as training in the quarterly performance reports.

Please note that placement into an unsubsidized apprenticeship is considered placement into employment. Please visit the <u>Apprenticeship Job Finder webpage</u>, where you can search for training providers. For definitions of the various types of job training, see the <u>HVRP Glossary of Terms</u>.

#### F. Job Placement

Grant recipients must have sound strategies for placing participants into unsubsidized employment in good-quality jobs that pay living wages in safe and healthy workplaces. Grant recipients must work toward assisting participants to secure or attain employment in accordance with their employment goals during the period of performance either through direct involvement by the grant recipient, through a robust referral system, or through the participant's own efforts. Grant recipients are allowed to report and take credit for one placement per enrollment. Also, while each grant recipient may report only one placement per enrolled eligible participant, you may track and report total placement transactions (when a participant is placed into employment multiple times) within your performance reports. See the <u>HVRP Glossary of Terms</u> for additional details on Job Placement Services.

Note: Grant recipients cannot claim credit for participant placement into employment that was attained or is maintained prior to program entry. See <u>HVRP Glossary of Terms</u> for more details on defining placement into employment.

Participants may be enrolled in the program more than once throughout the grant's threeyear PoP under the following conditions: a) more than 90 days have passed since the participant's last exit date, and b) the participant is still meeting the eligibility criteria to receive HVRP services. This is considered a new enrollment.

Participants that exit and return for services within 90 days of exit retain their original enrollment/eligibility status, and it is not considered a new enrollment, as the participant received services within 90 days of exit.

Participants experiencing a gap in service of 90 days or more due to a condition preventing them from program participation, such as a health condition or service in the National Guard/Reserve, may be temporarily exempted from being exited for a portion of the grant recipient's PoP.

If a participant was not placed by the end of the PoP and the grant recipient receives a new award:

- The grant recipient may enroll the participant into the new grant's PoP.
- If the participant met the eligibility requirements in the previous PoP when they were initially enrolled into HVRP, they do not need to meet the eligibility requirements described in Section V. of this VPL if they are enrolled into the new grant award's PoP.
- If the grant recipient enrolls these participants into the new grant award's PoP, they will be counted as new enrollments.
- All participants must be reported as "exited" at the end of the previously awarded PoP.

If a participant was not placed by the end of the PoP and the grant recipient **does not** receive a new award:

- All participants must be exited at the end of the PoP.
- Prior to the end of the PoP, the grant recipient must ensure that these participants are referred to other service providers (e.g., local AJC, another local HVRP grant recipient in the participant's SDA) that are able to assist them in meeting their employment goals.
- HVRP grant recipients must work with their GOTR to identify and track appropriate referrals for these participants.

**Employment Outcomes Verification:** The following are approved methods (through an employer, the participant, or an automated system) for documenting placement/employment outcomes (including dates of employment, hourly wages, and hours worked):

- Pay stubs;
- Automated employment verification systems;
- Employer statement of earnings;
- Documented contact with the employer attesting to employment of the participant; and
- Supporting documentation of self-employment and wages earned (see details below).

VETS does not categorically prohibit placements into self-employment. The participant must file a 1099 with the IRS to report self-employment earnings. The participant must share supporting documentation with the grant recipient as proof of self-employment and wages earned. This allows the grant recipient to determine hourly wages and other data elements required for reporting. Participants must provide documentation such as business license, employer ID for services performed to, copies of income checks, receipts of job materials and equipment, wage records, 1099 MISC Form, and/or

advertisement of services.

Note: All data sources and methods used must be documented and are subject to periodic on-site reviews by the GOTR.

### G. Follow-Up Services

Grant recipients provide post-exit follow-up services to participants to increase the success of employment and job retention.

1. Employment Retention: Grant recipients must provide employment adjustment services once the participant is placed into employment to assist in job retention. Due to numerous barriers and challenges that veterans experiencing homelessness face in their transition to careers and stable housing, employment adjustment services are designed to help a newly employed veteran adjust to a new job and are considered part of the veteran employment plan. This includes setting clear expectations, identifying stressors and developing an action plan to combat them, and tracking and celebrating success.

HVRP case managers or career coaches should offer guidance on any issues the newly employed individual encounters, including areas such as the following:

- Counseling to help the newly hired veteran adjust to new routines, schedules, and work environments;
- Building relationships with coworkers;
- Financial literacy;
- Enhancing customer service skills;
- Understanding and adapting to the company's culture; and
- Counseling to help the newly employed veteran work through the job situations that they find most troublesome.

For more information on employment retention services, see the HVRP Program Guide in the <u>New Grantees section</u> of NVTAC's website.

- 2. Follow-up Services: Grant recipients must provide post-exit follow-up services to participants enrolled and placed during the current PoP, and for four quarters after exit (through the end of the PoP), to increase the participant's success in employment retention. The following are examples of follow-up services:
  - Additional career planning;
  - Contacting the employer;
  - Assisting with work-related problems;

- Peer support groups;
- Informational mailings;
- Co-enrolled partner services for job retention;
- Follow-up tracking services; and
- Post-exit supportive services for job retention. Examples may include referrals for supportive services, incentives, work clothing, transportation assistance, etc. See Section IX. for additional information on participant support costs.

## **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. Needs are typically identified through the intake and assessment process and outlined in the employment plan. 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. A participant support cost should not duplicate a service a participant receives from another program (i.e., federal, state, local, etc., programs). VETS encourages grant recipients to make reasonable efforts to leverage other resources prior to incurring costs, if applicable. Participant support costs may be incurred *after* the participant exits (placed into employment) the program during the follow-up period (must be within PoP) if the cost is reasonable and necessary to retain employment.

Recurring participant support costs are limited to 90 days, unless noted otherwise.

Participant support costs under HVRP may include, but are not limited to:

- Assistance with transportation (including bikes, bus passes, gas cards, etc., if reasonable and necessary to obtain or retain employment);
- Assistance with childcare and dependent care, if eligible;
- Assistance with <u>housing for veterans transitioning from certain institutions, if</u><u>eligible;</u>
- Uniforms or other appropriate work attire and work-related tools or other related items necessary for training or employment;
- Assistance with books, fees, supplies, and other necessary items for job-driven training;
- Payments and fees for employment and training-related applications, tests, and certifications;

- Fines and fees that are creating a barrier to employment, up to \$100 per participant;
- Reasonable and necessary costs to start a business (e.g., filing fees and licenses) up to \$500 per participant. The business must be documented with the IRS. Start-up costs exclude costs for products and materials to start a business;
- Licensing fees and background check fees;
- Participant workplace accommodations that enable a participant to participate in employment, training, or education;
- Automobile repair that is necessary for the participant to seek, accept, or participate in employment and training activities. This is limited to repairs of an immediate need and excludes routine and normal maintenance costs, up to \$400 per participant; or
- Other reasonable and necessary costs to assist the participant in overcoming a barrier to obtain or retain employment.

Participant support costs that may not be allocated to the HVRP for participant support are:

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

All costs must support the goals and objectives of HVRP and must be adequately documented within the participant case file. Please see <u>2 C.F.R. § 200.403</u> on the factors affecting allowability of costs.

The use of a participant support cost is determined on an individual basis, and the grant recipient is required to have an SOP. See Section  $\underline{\text{VI.B}}$ . above.

## X. Incentives

Incentives may be provided to active HVRP participants for recognition and achievement directly tied to participation in the program and employment goals. Incentives may be

provided to enrolled participants and participants maintaining employment throughout the 12-month retention period.

Examples of allowable incentives may include gas cards or gift cards to a restaurant or grocery store provided to participants as an incentive for completing training, providing placement verification documentation, etc. 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. Incentives are used throughout the program to provide recognition for achievements and accomplishing goals. For an incentive to be effective, participants must be aware of the existence of such incentive and understand the terms and standards of award to improve the likelihood of it leading to successful program outcomes or achievement of grant performance measures.

Please see Section VI.B for the requirements of an SOP on incentives that outlines a disbursement policy and tracking system to ensure supportive services are implemented and executed consistently before incentives are dispersed.

## XI. VETS' Monitoring of the HVRP

A. 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. The state's Director for Veterans' Employment and Training (DVET) is responsible for conducting the OSR as the GOTR but may delegate the responsibility for completion to another VETS staff member.

The frequency of OSRs is based on time and risk, considering factors such as organizations that have not been awarded an HVRP grant recently, whether the grant recipient is on a corrective action plan (CAP) or designated as high-risk, or other factors identified by the GOTR. At minimum, a grant recipient will receive an OSR once per PoP.

VETS will notify the grant recipient in advance of the OSR. The notification will be in writing and include information on and the request for:

- The manner in which the OSR will be conducted (virtual or in-person);
- The start and end date for the OSR;
- List of participant files to be reviewed by participant ID;
- Access to active and closed participant case files (access to hard copy case files, electronically through the grant recipient's case management system, or emailed to the reviewer/GOTR prior to and during the on-site review);
- Names and/or titles of staff to be interviewed;

- Request for or identification of financial documentation to be reviewed/transmitted;
- List of policies, internal controls, and/or standard operating procedures that will be reviewed; and
- Other applicable documentation or information identified by the GOTR.

The grant recipient's OSR will consist of an entrance brief, period of review, and exit brief; a final report will be issued within 30 days of the completion of the exit brief. The final report will outline promising practices and include an assessment of compliance with all applicable laws, regulations, and VETS policies and directives. Should any findings result in an administrative or managerial CAP, in accordance with VPL 03-24 or the latest policy on CAPs, VETS and the grant recipient will follow that policy guidance for implementation, monitoring, and resolution of findings.

B. 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 number of audits per program is determined by available program funding. 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 CAP or is designated as high risk, or other factors identified by the GOTR to their Regional Administrator (RAVET). Due to the number of grants awarded each year, every grant may not receive an audit within their three-year PoP.

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.

The audit contractor's staff will notify the grant recipient approximately one month in advance of the audit's scheduled fieldwork start date. The period for an audit is typically three months from the notification to the final audit report.

The notification will be in writing and will include:

- The manner in which the audit will be conducted (virtual or in-person);
- The proposed start and end date for the audit;
- Request to schedule kick-off, walkthrough, and exit meetings;
- List of data/information requested to be reviewed by the audit staff during the prefieldwork planning phase of the audit;

- Names and/or titles of grant recipient staff to be contacted for audit documentation requests; and
- Timeline for grant recipient formal response to draft audit report.

The grant recipient's audit will consist of an entrance brief, period of review, exit brief, and the issuance of an audit report outlining the results of the audit. If findings are listed, the report will include the criteria, condition, cause, effect, and recommendation for each finding.

The grant recipient will work with the GOTR and/or other point of contact designated to address the outcomes of the audit, as applicable.

### **XII.** Actions Required

This guidance is effective immediately. HVRP recipients must:

- A. Immediately transmit this policy to appropriate staff.
- B. Update and implement policies and procedures to align staff and processes with these requirements.
- C. Consult with the appropriate GOTR if technical assistance is needed.

### **XIII. Inquiries**

Grant recipients should direct questions to their GOTR. GOTRs should refer questions or issues that cannot be resolved at their level to the regional office. Regional offices may send questions to <u>HVRP@dol.gov</u>.

## **XIV. Expiration Date**

This guidance is active until superseded or rescinded. It will be reviewed for relevance on or before September 30, 2027, and every two years thereafter.

#### **XV. Attachments**

Appendix: HVRP Definitions and Obtaining Documentation

## Appendix: HVRP Definitions and Obtaining Documentation

## **HVRP Definitions**

The following provides definitions for key terms used in this policy.

### Veteran

The term "veteran" is defined in <u>38 U.S.C. § 101(2)</u> as "a person who served in the active military, naval, air, or space service, and who was discharged or released therefrom under conditions other than dishonorable."

Eligible participants must be a "veteran," which means a person who served in the United States Army, Navy, Marine Corps, Air Force, Space Force, Coast Guard, or Reserve Component (National Guard or Reserve), who meets the following criteria:

- Received a discharge or release under conditions other than dishonorable (see 38 U.S.C. § 101(18)); and
- At least one day of active duty (see 38 U.S.C. § 101(21)) to include time spent in basic training for active-duty members; or
- Federal active duty for National Guard and Reserve members (does not include inactive or active duty for training as defined in 38 U.S.C. §§ 101(22) and (23)); or
- Any period of inactive duty or active duty for training during which National Guard and Reserve members received a service-connected disability rating resulting from a disease or injury incurred or aggravated in the line of duty (see 38 U.S.C. § 101(24)).

Important things to note about this definition include:

- There are no minimum days of service to determine eligibility.
- The veteran can have any character of discharge *except* dishonorable.
- Veterans with more than one period of service may have different characters of discharge (more than one issued DD-214). One other-than-dishonorable discharge qualifies the person as an eligible veteran, even if their most recent discharge was dishonorable, if they meet at least one of the eligible veteran criteria listed above.
- A veteran who is appealing their dishonorable discharge must be successful in the appeal before they meet the definition of an eligible veteran.
- This definition includes any period of inactive duty or active duty for training during which National Guard and Reserve members received a service-connected disability rating resulting from a disease or injury incurred or aggravated in the line of duty, meaning the individual received a VA disability rating and is able to provide a copy of the VA Summary of Benefits letter to verify the service-connected disability rating.

- For example, consider a National Guard or Reservist who gets injured during annual training. Even if they have never been on Title 10 orders, the service member could file a claim, and the VA could still provide a service-connected disability rating. If the veteran receives this rating at the time of enrollment into the HVRP, they are considered an eligible veteran.
- <u>Title 38 U.S.C. § 101</u> Veterans' Benefits Definitions does not state that the disability must be compensable, only that the veteran received a service-connected disability rating. This would include a zero percent rating.
- Time in basic training or Advanced Individual Training (AIT) for National Guard or Reserve members **does not** meet the definition of veteran. Basic training is considered "active duty for training." The definition of "active duty for training" pertains to the reserve component of the Armed Forces. Therefore, time spent in basic training by National Guard and Reserve members, as well as any other active or inactive duty for training, would not meet the definition of "veteran" per 38 U.S.C. § 101.
- Time in basic training or AIT for federal active-duty members **does** meet the definition of veteran.
- National Guard or Reserve members who served on federal active duty (does not include inactive or active duty for training (e.g., basic training or AIT, state active duty, weekend drills, etc.), see 38 U.S.C. § 101(22), (23)) are eligible for HVRP if they also meet the homeless, at risk of homelessness, participation in a <u>qualifying partner service</u>, *or* <u>transitioning from certain institutions</u> criteria. Depending on the length of their federal active duty, they may not have been issued a DD-214. For these circumstances when a DD-214 was not issued, the grant recipient should include the applicable military orders and/or NGB Form 22 in the case file to record eligibility.
- In some situations, a DD-214 (or the VA Summary of Benefits letter, military orders, or NGB Form 22, only when appropriate) is not readily available at the time of enrollment. Veterans may request records from the VA, their military unit, or National Personnel Records Center. Instructions for doing so are included below.

## **Homeless Veteran**

The term "homeless veteran" means a veteran who is homeless (as that term is defined in subsection (a) or (b) of section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. § 11302)), as follows:

- (a) In general, the terms "homeless," "homeless individual," and "homeless person" mean:
  - 1. an individual or family who lacks a fixed, regular, and adequate nighttime residence;
  - 2. an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

- 3. 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) (includes participants of VA GPD program);
- 4. an individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided;
- 5. an individual or family who-
  - A. will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by federal, state, or local government programs for low-income individuals or by charitable organizations, as evidenced by
    - i. a court order resulting from an eviction action that notifies the individual or family that they must leave within 14 days;
    - ii. the individual or family having a primary nighttime residence that is a room in a hotel or motel and where they lack the resources necessary to reside there for more than 14 days; or
    - iii. credible evidence indicating that the owner or renter of the housing will not allow the individual or family to stay for more than 14 days, and any oral statement from an individual or family seeking homeless assistance that is found to be credible shall be considered credible evidence for purposes of this clause;
  - B. has no subsequent residence identified; and
  - C. lacks the resources or support networks needed to obtain other permanent housing; and
- 6. unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statutes who—
  - A. have experienced a long-term period without living independently in permanent housing,
  - B. have experienced persistent instability as measured by frequent moves over such period, and
  - C. can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse, the presence of a child or youth with a disability, or multiple barriers to employment.
- (b) Domestic violence and other dangerous or life-threatening conditions:

An individual or family who:

- is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;
- 2. has no other safe residence; and
- 3. lacks the resources to obtain other safe permanent housing.

### Veteran At Risk of Homelessness

The following eligibility categories require meeting the "veteran at risk of homelessness" definition:

- Veterans who, at program entry, are at risk of homelessness within 15-60 days (veterans who are at risk of homelessness within 14 days are considered at "imminent risk" and are defined as homeless); and
- Veterans recently released (within the last 18 months) from incarceration who are at risk of homelessness.

The term "veteran at risk of homelessness" means meeting at least **one** of the following criteria:

- Veterans who meet the criterion for extremely low income<sup>2</sup>; or
- Veteran recipients of welfare and/or public assistance<sup>3</sup>; or
- Veterans referred from the following VA programs:
  - o Substance Use Residential Rehabilitation Treatment Program, or
  - o Domiciliary Residential Rehabilitation Treatment Programs (DRRTP), or
  - Veterans Justice Outreach Program VA Homeless Programs, or
  - Post-Traumatic Stress Disorder (PTSD) Residential Rehabilitation and Treatment Program, or
  - o Compensated Work Therapy/Transitional Residence Programs; or

<sup>&</sup>lt;sup>2</sup> Extremely Low Income: HUD sets family income limits for its housing programs, including an extremely low income (ELI) limit. ELI families are generally defined as very low-income families whose incomes do not exceed the greater of 30 percent of the median family income for the area or the federal poverty guidelines as published by the Department of Health and Human Services. HVRP grant recipients will find the most recent ELI limits available for the veteran's geographic location and family size at <u>HUD Income Limits</u>.

<sup>&</sup>lt;sup>3</sup> VETS defines welfare and/or public assistance recipients 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.

• 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).

Please note that veterans meeting the definition of <u>homelessness</u>, <u>transitioning from certain</u> <u>institutions</u>, or participating in a <u>partner program</u> **do not** need to meet the definition of "<u>at-risk of</u> <u>homelessness</u>." Veterans who are within 14 days of homelessness are considered at "imminent risk" and are defined as homeless.

To determine whether a veteran meets the "at risk of homelessness" criterion for extremely low income limits, grant recipients will use the most recent <u>HUD Income Limits</u>. To find the applicable income limits, grant recipients will use the following instructions:

- Access the <u>HUD Income Limits homepage</u>.
- Under the current year, under the "Query Tool" tab, click on "Click Here for FY 20XX IL Documentation" button.
- Select the state and county or HUD Metropolitan Fair Market Rent/Income Limits Area (HMFA) in which the participant resides at the most local level.
- Use the income limit under the "Extremely Low-Income Limits" category, selecting the appropriate number of persons in the family (number of individuals living in the household, to include the veteran), to determine whether the veteran meets the income criterion for "at risk of homelessness."

## **Transitioning from Certain Institutions**

The term "veteran transitioning from certain institutions" means an eligible veteran meeting the following definition per <u>38 U.S.C. § 2023</u>:

A <u>veteran</u> 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.

For HVRP, an at-risk determination for this specific definition involves factors deemed appropriate by the grant recipient; however, a grant recipient is not allowed to determine that a veteran is at risk if the veteran is not scheduled to be released from incarceration or an institution within 18 months (at the time of enrollment in HVRP). Please note that individuals qualifying under this category of veterans do not need to meet the "at risk of homelessness" criteria.

A penal institution includes any federal, state, county, local, and city facilities such as prisons, correctional centers, detention centers, reentry centers, penitentiaries, and jails.

### Child

For the purposes of defining child, VETS uses the definition of "child" at <u>38 U.S.C. § 101(4)</u>.

### Childcare Costs for Veterans with Children

HVRP funds may be used to provide childcare services for participants that meet the definition of homeless veterans with children, in accordance with <u>38 U.S.C. § 2021A</u>, to expedite the reintegration of homeless women veterans and homeless veterans with children into the labor force.

The use of grant funds for childcare services (allowable only to participants that meet the definition of a homeless veteran with children) is limited to 45 days, and the amount of assistance must be reasonable considering the average cost of childcare within the local community. Grant recipients expending HVRP funds for childcare services for these eligible participants must identify how they will exhaust other resources before identifying grant funds for this purpose. A grant recipient must provide documentation in the participant case file to include proof of enrollment with AJC partners, such as the Temporary Assistance for Needy Families (TANF) program or other federal benefit services, for childcare services. If a veteran with children can obtain funding for childcare services by any other means, such as through other federal or state programs, then HVRP grant funds cannot be used for such childcare costs. Grant recipients must have an SOP on the use of expending HVRP funds on childcare costs. Market and the service of the services are costs. Grant recipients must have an solution of the service costs must meet all these requirements.

## Housing Costs for Veterans Transitioning from Certain Institutions

Housing is a critical element for successful reintegration into the workforce. HVRP funds may be used for housing, but only for eligible participants who meet the definition of a <u>veteran</u> who is transitioning from certain institutions in accordance with <u>38 U.S.C. § 2023</u>.

Grant recipients expending HVRP funds for housing assistance (an allowable cost only for a veteran who is transitioning from certain institutions) must exhaust other housing options such as those offered by penal institutions, community-based housing providers, or other housing assistance options before identifying grant funds for this purpose. This must be documented in the participant case file. The use of grant funds for housing assistance is limited to 90 days, and the amount of assistance must meet the test of rent reasonableness. To meet this test and to be able to pay a landlord up to 90 days of reasonable rent, the applicant must secure at least three (3) samples of rent for housing units located in the specific community and zip code of the desired housing that meet the needs of eligible veterans transitioning from certain institutions. If the veteran can obtain housing by any other means, such as through other federal or state programs, then HVRP grant funds cannot be used for such housing costs for veterans transitioning from certain institutions. Grant recipients expending HVRP funds on housing costs must meet all these requirements.

## **Obtaining Documentation of Veteran Status**

The following provides specific steps for requesting a DD-214:

- Go to the <u>National Archives Veterans' Service Records website</u>. Under "Start Request Online," select "DD 214/Separation Documents." Then, select "Make a new request." When you get to the section that asks, "Which of these categories best describes why you're requesting the records?" select "Emergency Request" and then "Homeless Seeking Shelter." Using this option, you will be required to verify that the individual you are seeking documentation for meets their definition of homelessness before proceeding.
- Submit a military records request to get the DD-214 or other military service records through the <u>milConnect</u> website. See the VA's <u>instructions for navigating milConnect</u> for more information.
- Contact your state Department of Veterans Affairs, county's veterans service office, or local veteran service organization (e.g., VFW, DAV).
- Other resources include the following:
  - o <u>eVetRecs Request Veterans Records Online Service Records Requests</u>
  - o SF-180 Request Pertaining to Military Records form download

The following provides specific steps for requesting Veterans Benefits Management System (VBMS<sup>4</sup>) or the VA web application Status Query and Response Exchange System (SQUARES) documentation, which are acceptable as provisional source documents to expedite enrollment:

# VBMS

# Request by individual:

Veteran downloads <u>VA Form 10-5345a</u>, Individuals' Request for a Copy of their Own Health Information. This form is an online fillable PDF or can be printed and completed. Veteran submits completed form to the VA's Release of Information Office via email or fax. The Release of Information Office's email address and fax number vary based on the location of the VA Medical Center (VAMC).

Note: VA form 10-5345a must be dated 2017 or later.

# Request by Third-Party Release:

- HVRP staff downloads the <u>VA Form 10-5345</u>, Request for and Authorization to Release Health Information. This form is an online fillable PDF or can be printed and completed.
- The veteran must complete the VA Form 10-5345.

<sup>&</sup>lt;sup>4</sup> Formally known as VA Medical Centers' Hospital Inquiry (HINQ)

- The veteran must also specify in the section labeled "Name and address of organization, individual, or title of individual to whom information is to be released" the HVRP office seeking the VBMS, along with the fax number where it is to be sent. The veteran's signature is required for the form to be processed. For rapid response receipt (within 24-48 hours), a fax number must be provided.
- Email or fax the form directly to the VA's Release of Information Office.

## **SQUARES**

Before applying, organizations should complete a <u>10-minute Online Training for homeless service</u> <u>providers</u>. Instructions to apply for SQUARES access are available on the <u>VA website</u>.