

**Effective date of changes is March 27, 2020.**

This document provides implementation guidance regarding the following provisions of the Coronavirus Aid, Relief, and Economic Security (CARES) Act (P.L. 116-136):

- (1) shall waive any requirement to discharge a veteran from the grant and per diem program of the Veterans Health Administration after the veteran is absent for 14 days; and
- (2) may continue to pay per diem to grant recipients and eligible entities under the program for any additional days of absence when a veteran has already been absent for more than 72 hours.

In response to the enactment of the CARES Act (P.L. 116-136), the Grant and Per Diem (GPD) Program is making *temporary* modifications to its discharge and per diem payment policies, as outlined below.

Note, grantees and liaisons should work closely to avoid discharging Veterans to the streets or unsafe conditions. Lengths of stay (greater than 2 years) or number of episodes of care should not be reasons to discharge Veterans or deny access to services. Strong coordination is required to ensure safe, appropriate housing options are available for Veterans, especially during this COVID-19 public health emergency.

## **Veteran Absence – Program Discharge:**

1. During the current public health emergency, the requirement to discharge Veterans absent from the program for more than fourteen days is waived under the following circumstances:
  - a. Veteran required a more intensive level of care than offered by the GPD grantee based on medical, mental health, or other treatment needs (e.g., hospitalization, quarantine)
  - b. Veteran leaves the program with consultation but cannot or chooses not to return due to COVID-19 considerations (e.g., shelter-in-place restriction, temporary stay with family/friends, Reserves or National Guard deployment)
2. It is required that there be a reasonable expectation that the Veteran will return to the program and the grantee must hold the bed for the Veteran.
3. Grantees must provide a minimum of monthly updates on the Veteran's absence to the GPD liaison. As appropriate, GPD liaisons should document the Veteran's Electronic Health Record.
4. Veterans should continue to be discharged from GPD when:
  - a. Successfully completing the GPD program and transitioning to permanent housing
  - b. Transferring to another program (e.g., SSVF, HUD-VASH, another GPD project)
  - c. The Veteran declines to continue to participate in the GPD Program
  - d. Veteran receives a short-term jail sentence
  - e. Veteran leaves the program without consulting staff (AWOL)
  - f. Veteran incarcerated or deceased
  - g. Grantee asks Veteran to leave for any reason, including but not limited to, because of a violation of program rules or failure to comply with program requirements

### ***Veteran Absence – Payment of Per Diem:***

Note, grantees must continue to monitor their actual incurred costs for care to GPD Veterans to ensure that they are not overbilling, especially when requesting per diem payments for Veterans when they are absent from the program.

1. During the current public health emergency, the requirement to stop per diem payments for Veterans absent from the program for more than 72 hours is waived under the following circumstances:
  - a. Veteran required a more intensive level of care than offered by the GPD grantee based on medical, mental health, or other treatment needs (e.g., hospitalization, quarantine)
  - b. Veteran leaves the program without consulting staff (AWOL) – per diem payments limited up to 7 days
  - c. Veteran leaves the program with consultation due to COVID-19 considerations (e.g., shelter-in-place restriction, temporary stay with family/friends, Reserves or National Guard deployment)
2. It is required that there be a reasonable expectation that the Veteran will return to the program and the grantee must hold the bed for the Veteran.
3. Grantee must follow-up with the Veteran(s), at least weekly, to check on their status, confirm plans to return to the GPD program, and document follow-up contact in the Veteran's record/case file.
  - a. If at any point the Veteran's absentee status shifts to one of the categories outlined under paragraph 8 (below), per diem payments will stop and the GPD liaison must be notified. Documentation in the grantee and Veteran records should occur, as appropriate.
4. Information regarding the absence should be communicated and reassessed between the grantee and the GPD liaison at least monthly, to include:
  - a. GPD grantee must document the Veteran's status in the case file/record
  - b. GPD liaison must document the outcome of the discussion with the grantee regarding the Veteran's absence in the Veterans Electronic Health Record
  - c. Rationale for the absence and expected timetable for return must be documented in the grantee case file and medical center Electronic Health Record
5. A grantee cannot bill for more than the total number of beds they are authorized.
6. Provided the above conditions are met, the duration of payments for absences is not limited.
7. VA will not pay for absences in excess of 72 hours that occurred prior to the enactment of the CARES Act, which took effect on March 27, 2020.
8. Per diem payments for a Veteran will stop under any of the following conditions:
  - a. Successfully completing the GPD program and transitioning to permanent housing
  - b. Transferring to another program (e.g., SSVF, HUD-VASH, another GPD project)
  - c. The Veteran declines to continue to participate in the GPD Program
  - d. Veteran incarcerated or deceased

- e. Grantee asks Veteran to leave for any reason, including but not limited to, because of a violation of program rules or failure to comply with program requirements