



Grant and Per Diem Operational Call

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Tuesday, April 14, 2020 at 2pm Eastern/11am Pacific

Visuals: <http://va-eerc-ees.adobeconnect.com/gpdbh/>

Audio: 1-800-767-1750 Code: 17663#

Agenda

1. Grant and Per Diem (GPD) Announcements and Updates
2. Office of Business Oversight (OBO) Announcements and Updates
3. COVID-19 Guidance and Frequently Asked Questions
4. COVID-19 Discussion and Resources
5. Next Steps

GPD Program Office Announcements and Updates: NOFAs

1. Transition in Place (TIP) Notice of Funding Availability

- Published on February 18th and due by Wednesday, April 22nd at 4pm ET
- Electronic Submission via GIFTS
- Open to new and existing applicants
- Extension for VAMC Letters of Collaboration Only (5/13/20 at 4pm ET)
- Resources on our website: <https://www.va.gov/homeless/gpd.asp>

2. Special Needs Notice of Funding Availability

- Due by April 27th at 4pm ET
- Open existing 11 applicants only
- Resources on our website: <https://www.va.gov/homeless/gpd.asp>

GPD Program Office Announcements and Updates: Quarterly Reviews and Reporting

PDO, Service Centers, and TIP

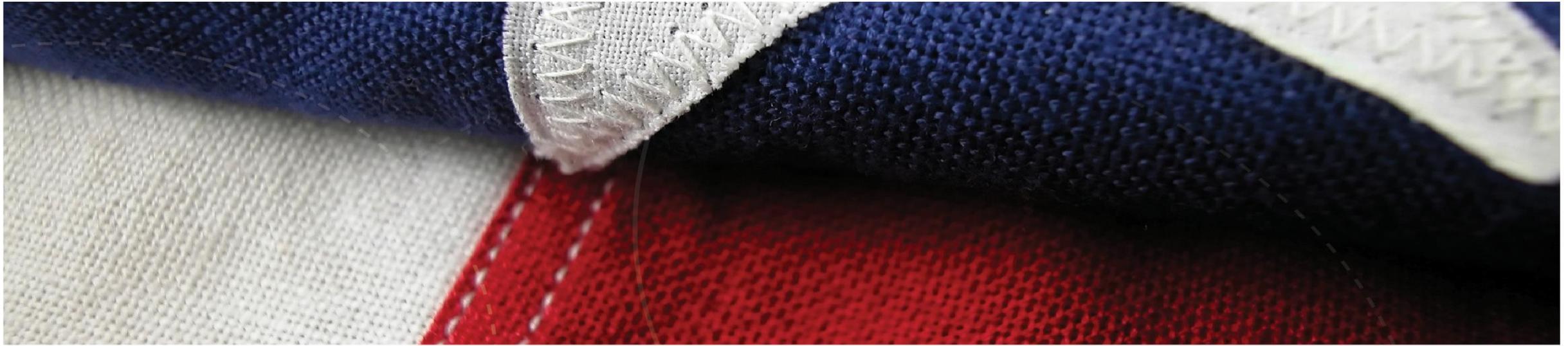
- Quarterly Review-**Modified**,
Focus on Response Planning
- Unannounced Nutrition
Inspections-**Waived**
- Grantee National Calls-**On Time**

Case Management Grant

- Quarterly Review-**Waived**
- Caseload Tracking Tool-**On Time**
- Financial Information Survey-**On Time**
- Grantee National Call-**On Time**
- April/May Cohort Calls-**Postponed**

Office of Business Oversight

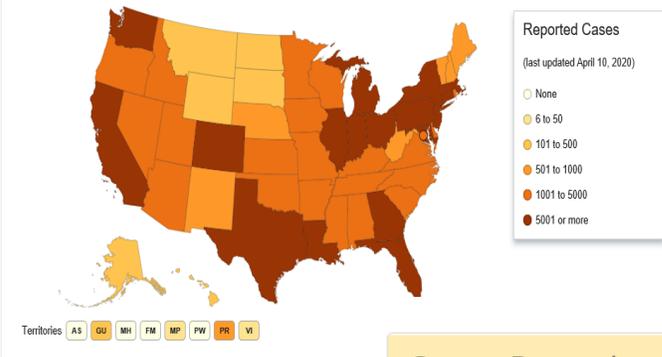
- **New Federal Contractors**
 - Gentech Associates, Inc. and KPMG
- **Upcoming Desk Reviews**
 - First at Blue Ridge, Ridgecrest, NC – May 19-21, 2020
 - Work Express, Brockton, MA – May 19-21, 2020
 - Minnesota Assistance Council for Veterans, Minneapolis, MN – June 2-4, 2020
 - Housing Authority, Walla Walla, WA – June 15-19, 2020
 - Salvation Army, Houston, TX – June 23-25, 2020
- **Upcoming Site Visits**
 - Joseph House, Cincinnati, OH – July 7-9, 2020
 - 12 & 12 Inc., Tulsa, OK – July 14-16, 2020
- **Indirect Cost Rates**
- **Training Item of the Month: \$200.407 – Prior written approval (prior approval).**
 - Under any given Federal award, the reasonableness and allocability of certain items of costs may be difficult to determine. In order to avoid subsequent disallowance or dispute based on unreasonableness or nonallocability, the non-Federal entity may seek the prior written approval of the cognizant agency for indirect costs or the Federal awarding agency in advance of the incurrence of special or unusual costs. Prior written approval should include the timeframe or scope of the agreement.



COVID-19 Guidance and Frequently Asked Questions

Dynamic Changing System: Opportunities for Innovation

States Reporting Cases of COVID-19 to CDC* April 10th



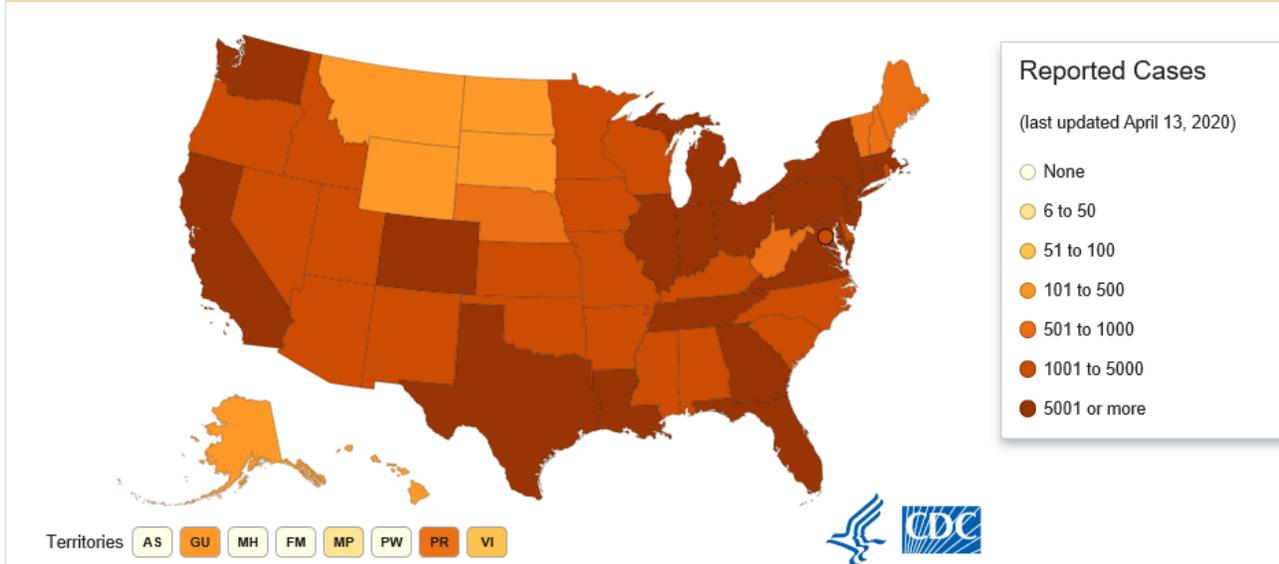
As of 4/13/20 from CDC:

Total cases: 554,849

Total deaths: 21,942

Jurisdictions reporting cases: 55 (50 states, District of Columbia, Guam, Puerto Rico, the Northern Mariana Islands, and the U.S. Virgin Islands)

States Reporting Cases of COVID-19 to CDC* April 13th



Total Confirmed
1,935,646

Confirmed Cases by Province/State/Dependency

- 196,146 confirmed New York US
- 67,803 confirmed Hubei China
- 64,584 confirmed New Jersey US
- 26,867 confirmed Massachusetts US
- 25,635 confirmed Michigan US
- 24,372 confirmed California US
- 24,336 confirmed Pennsylvania US
- 22,025 confirmed Illinois US
- 21,019 confirmed Florida US
- 21,016 confirmed Louisiana US
- 14,505 confirmed Texas US
- 13,557 confirmed Quebec Canada
- 13,381 confirmed Connecticut US
- 13,125 confirmed Georgia US
- 10,725 confirmed Washington US

Johns Hopkins Coronavirus Resource center

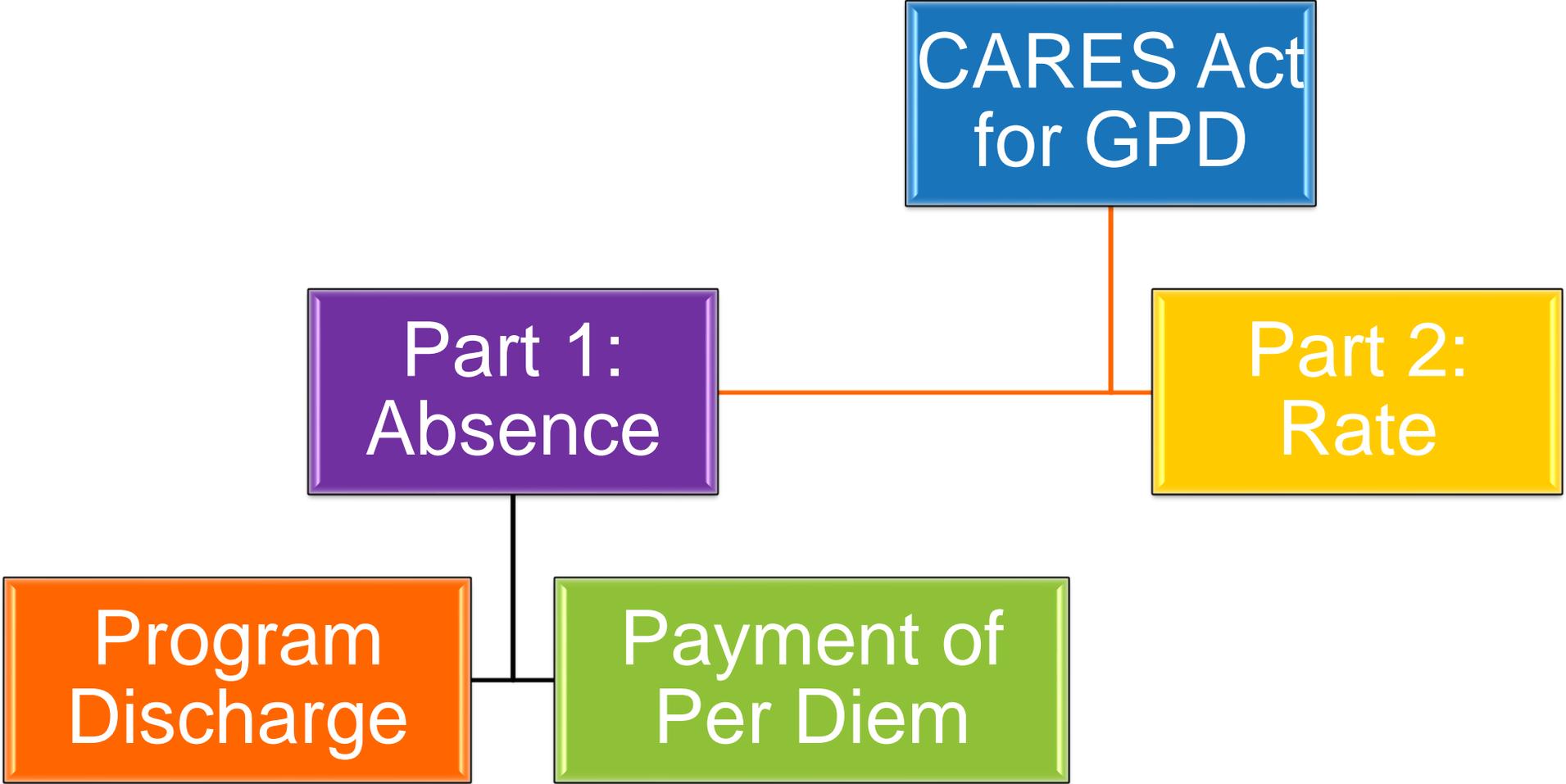
Admin0 Admin1 Admin2

Last Updated at (M/D/YYYY)
4/14/2020, 9:31:23 AM

Inspiration

- “Today as we look at what is happening in the course of the virus and many of your communities, the war that we are engaged in against this virus has **hope**...we are not there yet, and we have a lot of tough days ahead...but as you think about where we are at...I want you to realize that there is always **hope**. Hope comes from families and teams coming together to help and support each other and knowing that tomorrow will be better.” -**Dr. Richard Stone, VHA Executive in Charge**
- “The trajectory is the trajectory that we create by our actions.”
-**Governor Andrew Cuomo**
- **You, your work, your staff, and your community partners.**
- **What inspires you? What keeps you going? (Type in chat).**

CARES Act Implementation: GPD



CARES ACT: GPD Program Veteran Absence Guidance

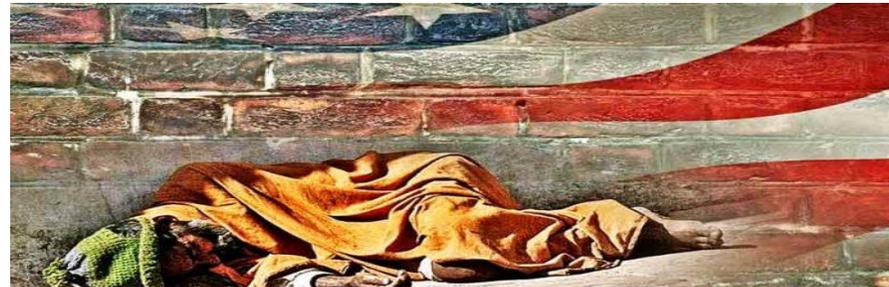
Published: 4/7/20
Effective: 3/27/20

- 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



Preface: Response Planning & Coordination

- 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.



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CARES ACT: Veteran Absence: Program Discharge

1. During the current public health emergency, the requirement to discharge Veterans absent from the program for more than fourteen (14) 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 as outlined in the guidance.



CARES Act: 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.



CARES Act: Veteran Absence: Payment of Per Diem Cont'd.

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.



CARES Act: Veteran Absence: Payment of Per Diem Cont'd.

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



CARES ACT:

Per Diem Rate Change

- CARES Act states the Secretary *may* waive limits on the rates of per diem payments
- GPD is exploring the option of *temporarily* removing the existing cap on per diem rates for PDO, TIP, and Service Center grants
- Per diem rate increases would not be automatic; request required
- For any per diem rate request, grantees must ensure:
 - Incur sufficient costs to support the rate requested
 - Costs are reasonable
 - Costs cannot exceed the scope of the grant
- Additional information on per diem rate changes sent via email through GIFTS POC's

CARES Act Statutory Language:

(b) GRANTS AND PER DIEM PAYMENTS.—In the case of a public health emergency, the Secretary of Veterans Affairs may waive any limits on—

- (1) grant amounts under sections 2011 and 2061 of title 38, United States Code; and
- (2) rates for per diem payments under sections 2012 and 2061 of such title.



Background on Isolation Options

- VHA Homeless Programs Office issued guidance regarding temporary emergency housing options (updated March 27, 2020)
- Guidance describes four options for GPD grantees
- Guidance may change as the COVID-19 situation evolves

Options for Social Isolation Under the COVID-19 National Emergency Guidance for VA-Funded Community Homeless Programs

The following options have been developed by the Homeless Program Office to provide official guidance regarding use of existing program authorities to support COVID-19 isolation efforts. Please note, guidance may change in this evolving situation, and updates to this guidance will be provided when received. Note, this guidance is as of **March 27, 2020**.

Grant and Per Diem

The GPD Program office is willing to work with grantees to authorize additional sites of care under their program to assist with social distancing efforts or the need to provide quarantine/isolation spaces for symptomatic or vulnerable Veterans. Please see the four options identified below under existing authorities.

Isolation Option 1: Grantee has space at existing location

- Grantee is proposing to use additional space within their current site (maybe second floor perhaps or staff room that has now been turned into isolation area).
- The site has been inspected; no email needed to the GPD Office. Grantee and liaison should maintain local records.

Isolation Option 2: Grantee does not have space at existing location

- Grantee proposes a new site that is not currently written into their grant but that their agency has access to.
- Grantee sends change of scope for expeditious review.
- Modified inspection process may be used to facilitate rapid movement of Veterans.
 - Veterans could be placed in a facility immediately for a period of up to 15 calendar days to provide the VAMC time to conduct an inspection.
 - Inspections may be conducted virtually, as applicable, using video (i.e. FaceTime, Skype, Zoom). Note that signatures from the inspector and VAMC Director are still required on the inspection package.
 - If the site was previously inspected and approved for HCHV within the last 12 months, this inspection will be accepted for temporary placement of Veterans in GPD.

Isolation Option 3: Use of another GPD facility

- Grantee does not have space, but another existing GPD grantee does and is willing to take the Veteran.
- Transfer Veteran to that location; discharge and admit to the new grantee.
- No inspection needed because site was already inspected as an existing grantee.

Isolation Option 4: Use of local motel/hotel room

- The grantee does not have space in their facility and seeks to isolate a homeless Veteran(s) temporarily in a motel/hotel room.
- Veterans may be placed for a period for up to 30 days without inspection to facilitate rapid movement into these locations and support the health of Veterans in the facility.
- If the stay is greater than 30 days, or if the grantee intends to use the room for more than 30 days the site must be inspected by VA to continue.
- The approval of such a plan is contingent upon the grantee having a plan to be able to check on the Veteran daily (remote contact allowed) for wellness checks, and support services as needed. In addition, a plan for meals for the Veteran must also be in place.



Isolation Option 1

- **Grantee has space at existing location**
 - Grantee has additional space within their current site (maybe second floor perhaps or staff room that has now been turned into isolation area).
 - The site has been inspected; no email needed to the GPD Office.
 - Grantee and liaison should maintain local records.



Isolation Option 2

- **Grantee does not have space at existing location**
 - Grantee proposes a new site that is not currently written into their grant.
 - Grantee sends change of scope for expeditious review.
 - Modified inspection process to facilitate rapid movement of Veterans.
 - Veterans could be placed in a facility immediately for a period of up to 15 calendar days to provide the VAMC time to conduct an inspection.
 - Inspections may be conducted virtually using video (i.e. FaceTime, Skype, Zoom). Signatures from inspectors and VAMC Director still required
 - If site was previously inspected and approved for HCHV within the last 12 months, this inspection will be accepted for temporary placement of Veterans in GPD.



Isolation Option 3

- **Use of another GPD facility**
 - Grantee does not have space, but another existing GPD grantee does and is willing to take the Veteran.
 - Transfer Veteran to that location; discharge and admit to the new grantee.
 - No inspection needed because site was already inspected as an existing grantee.



Isolation Option 4

- **Use of local motel/hotel room**
 - The grantee does not have space in their facility and seeks to isolate a homeless Veteran(s) temporarily in a motel/hotel room.
 - Veterans may be placed in a motel/hotel room to facilitate isolation/social distancing efforts in relationship to the COVID-19 public health emergency.
 - Time-limited use without inspection through September 30, 2020
 - Daily wellness checks on the Veteran (remote contact allowed), and support services as needed. In addition, a plan for meals for the Veteran must also be in place.
 - Veteran counted in monthly census and grantees may not exceed their authorized number of beds.
 - Grantee may bill at their authorized per diem rate for the bed days of care provided



Change of Site

- Our office fully anticipates that grantees may be requesting a change of site to further enhance their ability to maintain Veteran wellness and creating spaces of isolation. This is an option.
- Grantees should consider if a proposed change of site is temporary or permanent.
- These are the steps:
 - Grantee speaks with liaison as part of response planning.
 - Grantee sends an email to gpdgrants@va.gov with the subject **“Change of Site Request: FAIN or FAINs-COVID-19 Response”** and cc their GPD liaison and NHC
 - Explain the current location and include address or addresses of the location where services take place for FAIN or FAINs
 - Indicate the proposed new location or site and it’s function (will be used for isolation, will include Vets and non-Vets, looks like x or y, social distancing, etc. or will be used to support wellness for Veterans not experiencing symptoms, and Veterans experiencing symptoms will remain in current location or whatever scenario is)
 - Why it is needed
 - If new site/additional site has been inspected
 - Any other relevant information
- Once we receive the request, we will review and respond.
- Temporary requests for changes of site that are approved would be in effect through 9/30/20.

Implementation of OMB Memorandum M-20-17: Relief from COVID-19 Impacts

- Flexibility with SAM Registration
- Flexibility with VAMC Letters of Coordination Deadline
- Prior Approval Requirement Waivers
- Extension of Financial, Performance, and Other Reporting
- Extension of Currently Approved Indirect Cost Rates
- Extensions of Single Audit Submissions

RELIEF FROM COVID-19 IMPACTS DUE TO LOSS OF OPERATIONS FOR VA GRANTEES PROVIDING HOMELESS SERVICES

APRIL 03, 2020

VA Grant and Per Diem (GPD) implementation of [OMB memorandum M-20-17](#), entitled, *Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations* dated March 19, 2020.

As we face challenges in confronting the COVID-19 epidemic, GPD prioritizes the health and safety of the Veteran, grantee, and VA communities. GPD understands the effects this challenge has on GPD-funded grants. We are committed to providing the greatest flexibilities to support your health and safety as well as your work. GPD continually updates our online resources to keep you informed. The latest information is available on our provider website at: https://www.va.gov/HOMELESS/GPD_ProviderWebsite.asp.

The purpose of this guidance is to implement flexibilities authorized by the Office of Management and Budget (OMB) Memorandum M-20-17 from specific administrative, financial management and audit requirements contained in 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, without compromising accountability requirements. GPD grantees are reminded of the requirement to maintain appropriate records and documentation necessary to support charges to GPD awards.

Please note that, pursuant to OMB guidance, these administrative relief flexibilities are intended to be time limited. OMB plans to reassess their applicability within 90 days and GPD will update our guidance, as needed, at that time. Except where noted below, the following flexibilities are applicable to GPD grantees affected by the loss of operational capacity and increased costs due to the COVID-19 emergency.

1. Flexibility with SAM registration. (2 CFR § 200.205)

GPD is providing this flexibility to all applicants for the currently open Transition In Place (TIP) notice of funding availability (NOFA). GPD will not consider the System for Award Management (SAM) registration status at the time of application receipt. Instead, GPD will evaluate the SAM status prior to awarding successful applications.

Current registrants in SAM with active registrations expiring before May 16, 2020, automatically will be afforded a one-time extension of 60 days. Grantees do not have to take any action to receive this automatic flexibility provided by OMB.

2. Flexibility with application deadlines. (2 CFR § 200.202)

GPD is providing this flexibility to the currently open TIP NOFA. The application deadline for the TIP NOFA is 04/22/2020 at 4:00pm eastern. This deadline remains unchanged. However, because of the challenges faced by the community due to the COVID-19 emergency, GPD is extending the time available for submitting letters of coordination from the VA Medical Centers for the application package. The extended deadline for submitting letters of coordination from a VA Medical Center is

Discussion and Resources

- **What is working well?**
 - Do you have any resources or suggests for other grantees?
 - Tell us about how you are partnering with your GPD liaison, your VAMC, CoC, and community public health, and emergency services.
- **What has been a challenge?**
 - If you have an idea for someone's challenge, please add.
 - What questions do you have?
- **What other resources do you feel like you need (policy, guidance, application, community-level, etc.)?**
 - Are there any other ways that we can best support you and your team?

Next Steps

National GPD Operational Grantee Call

- *All Grantee Call-Tuesday, May 12th at 2pm Eastern/11am Pacific*
- **GPD Questions?**
 - 1st : Review Grant Materials and Training
 - 2nd : Connect with your Supervisor
 - 3rd : Contact your GPD Liaison (Include FAIN)
 - 4th : Contact the GPD Program Office at gpdgrants@va.gov (Include FAIN) & Cc GPD Liaison