

GRANT & PER DIEM NATIONAL PROGRAM OPERATIONAL GRANTEE CALL

October 11, 2022

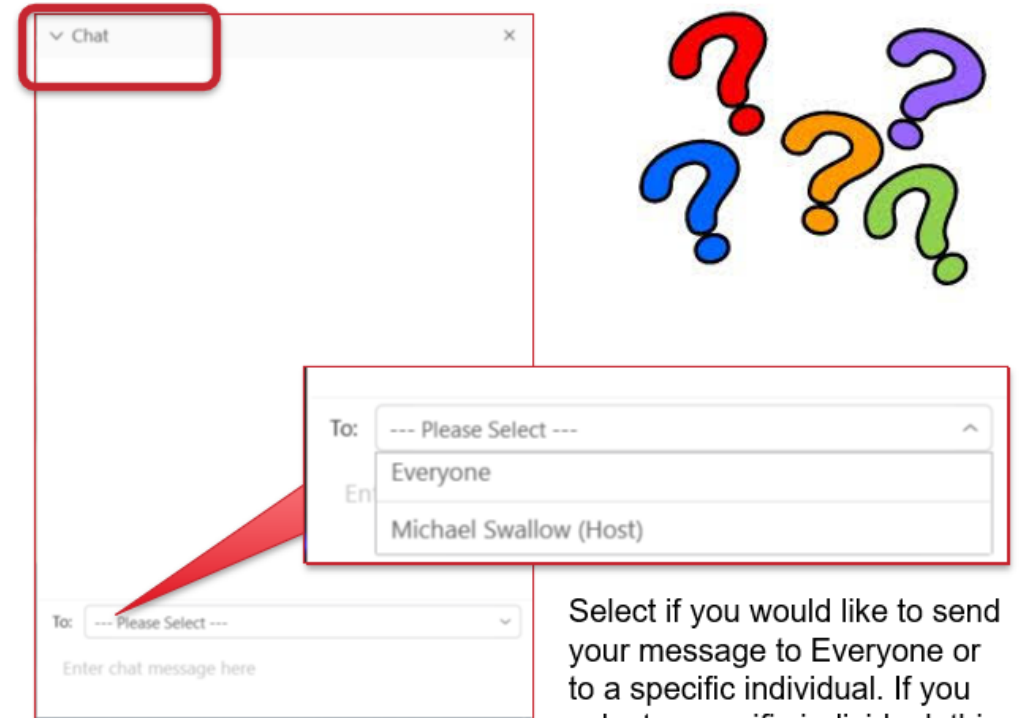
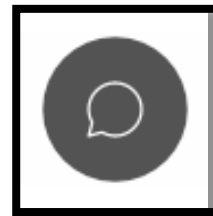
RECORDING LINK: <https://veteransaffairs.webex.com/recording/service/sites/veteransaffairs/recording/playback/97516b6e2bbc103bbcbf00505681a01b>

RECORDING PASSWORD: Homeless1!

HOUSEKEEPING

- This meeting is being recorded.
- Past recordings are available on the GPD provider website:
https://www.va.gov/HOMELESS/GPD_ProviderWebsite.asp
- The webinar will last approximately 60 minutes.
- Mics and video are disabled (but always check to make sure you're on mute).
- Questions can be submitted using the Chat function.

Select the Chat icon on the tool bar at the bottom of the screen.



Select if you would like to send your message to Everyone or to a specific individual. If you select a specific individual, this will send the message privately so no one else in the meeting will see it.

AGENDA

- **Announcements**
 - Option year two agreements
 - GPD Notices of Funding Opportunity (NOFOs)
 - Public health emergency declaration
- **Grantee Financial Management Responsibilities**
 - Federal Financial Report (SF-425)
 - Per diem rate requests
 - OMB Uniform Guidance (2 CFR 200)
 - Nonprofit Governance
 - Fiscal reviews and monitoring
- **Office of Business Oversight (OBO) – Omar Ochoa**
- **Operational Announcements**
 - Performance Measure Changes
 - Inspection Reminders

ANNOUNCEMENTS



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OPTION YEAR GRANT AGREEMENTS

- [Retrieve executed option year agreement](#)
 - [GPD Electronic Grants Management \(eGMS\) System](#)
- Option year 2
 - Final option year for all PDO projects
 - October 1, 2022 – September 30, 2023
- To receive per diem funding beginning October 1, 2023, organizations must successfully compete for a PDO and/or TIP grant under the NOFOs expected to be announced in the fall 2022.
 - Organizations that received a CARES Act or ARP Capital grant must successfully apply to comply with the performance period required under those awards.

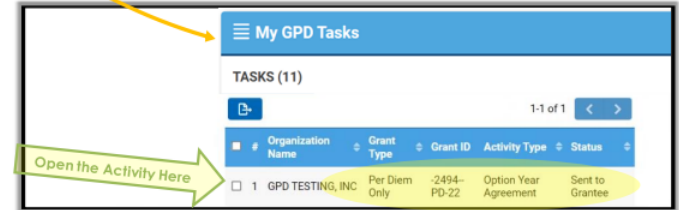
Grant & Per Diem: eGMS Guide

How-To: **Retrieve Your Executed OPTION YEAR Grant Agreement**

Step 1: Log in to eGMS, Select Option Year Activity

➤ A Grant Contact of the grant record will select the Option Year Activity in the **My GPD Tasks** area, as shown below:

*Note: If you do not see a task here, you are not a Grant Contact for this grant record. If you are not a listed Grant Contact, you will not be able to complete this activity. If that is the case, please reach out to the GPD National Program Office at GPDgrants@va.gov for assistance.



The screenshot shows a web interface titled "My GPD Tasks" with a sub-header "TASKS (11)". Below the header is a table with columns: #, Organization Name, Grant Type, Grant ID, Activity Type, and Status. A single row is visible with the following data: # 1, Organization Name GPD TESTING, INC, Grant Type Per Diem Only, Grant ID -2494-PD-22, Activity Type Option Year Agreement, and Status Sent to Grantee. A yellow arrow points to the "My GPD Tasks" header, and a green arrow points to the first row of the table with the text "Open the Activity Here".

#	Organization Name	Grant Type	Grant ID	Activity Type	Status
1	GPD TESTING, INC	Per Diem Only	-2494-PD-22	Option Year Agreement	Sent to Grantee

NOTICES OF FUNDING OPPORTUNITY (NOFO)

- GPD intends to announce three NOFOs in FY 2023
 1. Per Diem Only (PDO) NOFO
 2. Transition in Place (TIP) NOFO
 3. Case Management NOFO
- Announcements will be posted on the [GPD website](#) and [grants.gov](#)
- Initiate discussions with your local VA staff (e.g., GPD liaison, medical facility director, NHC) and community partners (e.g., CoC), particularly if you will be asking for coordination letters.
 - Request coordination letters early
 - Be prepared to share specifics of your proposal (e.g., number of beds, housing models, services, staffing ratios, location, facility configuration, past performance, improvements)
 - A coordination letter template will be posted on the GPD website along with other technical assistance materials
- These NOFOs are not renewals
 - Open to current and new organizations
 - Applicants may change/update numbers of beds, housing models, services, staffing, etc.
 - Be prepared to speak to past performance, including challenges and improvements

PUBLIC HEALTH EMERGENCY DECLARATIONS

- Current [COVID-19 Public Health Emergency](#) declaration expires October 13, 2022.
 - HHS Secretary has committed to providing a 60-day notice before any termination.
 - The declaration is extended in 90-day increments.
- GPD will continue to offer the per diem rate waiver (3x State Home domiciliary rate) until the declaration ends or it is rescinded by the VA Secretary.
 - Waiver has been in effect since March 2020.
- There are other pieces of legislation (e.g., S. 2172 “Building Solutions”) that have been introduced in the House and/or Senate that propose to permanently increase GPD’s maximum per diem rate.
 - Recognition that the cost to provide quality transitional housing services in less congregate settings has increased.

GRANTEE FINANCIAL MANAGEMENT RESPONSIBILITIES



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FEDERAL FINANCIAL REPORT (SF-425)

- All grantees are required to submit a [Federal Financial Report \(SF-425\)](#) documenting actual costs incurred during fiscal year (FY) 2022.
 - Reporting period is from October 1, 2021 – September 30, 2022.
 - A separate report must be submitted for each FAIN.
 - Submission of these reports is a condition of these awards and a requirement to receive Federal funding.
- SF-425's will be reviewed by VA's Office of Business Oversight (OBO).
 - Submit the SF-425 via the [Electronic SF-425 Submission Portal](#) **and** email the completed form with supporting documentation (general ledger) to GPD425@va.gov.
- SF-425 submissions **due no later than Monday, January 30, 2023.**
 - Early submissions are encouraged.
 - GPD will issue a withholding of payments for any grant projects that have not submitted a properly completed SF-425 and general ledger by the due date.

The screenshot shows the 'Federal Financial Report' form with various sections and fields. At the top right, it includes the OMB Number (4040-0014) and Expiration Date (02/28/2022). The form is divided into several numbered sections:

- 1. Federal Agency and Organizational Element to Which Report is Submitted**: A redacted field.
- 2. Federal Grant or Other Identifying Number Assigned by Federal Agency**: A redacted field.
- 3. Recipient Organization (Name and complete address including Zip code)**: Fields for Recipient Organization Name, Street1, Street2, City, State, County, Province, Country (USA: UNITED STATES), and ZIP / Postal Code.
- 4a. DUNS Number** and **4b. EIN**: Redacted fields.
- 5. Recipient Account Number or Identifying Number**: A redacted field.
- 6. Report Type**: Radio buttons for Quarterly, Semi-Annual, Annual, and Final.
- 7. Basis of Accounting**: Radio buttons for Cash and Accrual.
- 8. Project/Grant Period**: From and To date fields.
- 9. Reporting Period End Date**: A date field.
- 10. Transactions**: A table with columns for 'Transactions' and 'Cumulative'. It includes sub-sections for Federal Cash, Federal Expenditures and Unobligated Balance, Recipient Share, and Program Income.

Transactions	Cumulative
<i>(Use lines a-c for single or multiple grant reporting)</i>	
Federal Cash (To report multiple grants, also use FFR attachment):	
a. Cash Receipts	0.00
b. Cash Disbursements	0.00
c. Cash on Hand (line a minus b)	0.00
<i>(Use lines d-o for single grant reporting)</i>	
Federal Expenditures and Unobligated Balance:	
d. Total Federal funds authorized	0.00
e. Federal share of expenditures	0.00
f. Federal share of unliquidated obligations	0.00
g. Total Federal share (sum of lines e and f)	0.00
h. Unobligated balance of Federal Funds (line d minus g)	0.00
Recipient Share:	
i. Total recipient share required	0.00
j. Recipient share of expenditures	0.00
k. Remaining recipient share to be provided (line i minus j)	0.00
Program Income:	
l. Total Federal program income earned	0.00
m. Program Income expended in accordance with the deduction alternative	0.00
n. Program Income expended in accordance with the addition alternative	0.00
o. Unexpended program income (line l minus line m or line n)	0.00

PER DIEM RATE REQUESTS

- All grantees should monitor their per diem rate for accuracy, monthly ([GPD Recipient Guide](#), page 4).
 - Per diem is up to 100% of the estimated cost of care, minus other sources of income ([38 CFR 61.33\(c\)](#)).
 - If costs change, grantees are required to [submit an updated per diem rate request](#).
 - Grantees may submit a per diem rate request at any point during the fiscal year.

- Grantees **may not** accrue substantial unobligated funds through the over-estimation of their per diem rate.
 - This is non-compliant with the terms and conditions of the GPD grant.
 - Excessive accrual of unobligated funds demonstrates a lack of internal controls ([2 C.F.R § 200.303](#)).
 - Federal payments require that “payment methods must minimize the time elapsing between the transfer of funds from the United States Treasury or the pass-through entity and the disbursement by the non-Federal entity” ([2 C.F.R § 200.305](#)).

OMB UNIFORM GUIDANCE

- All costs charged to the grant must be **allowable** ([2 C.F.R. § 200.403](#)), **allocable** ([2 C.F.R. § 200.405](#)) and **properly segregated** within your financial system.
 - Grantees are responsible to have qualified staff knowledgeable regarding federal funding requirements (e.g., 2 CFR 200) and ensure their accounting systems comply with these requirements.
- Grantees must ensure **cost reasonableness** when allocating costs to a federal award.
 - Costs must meet certain general criteria in order to be allowable under Federal awards, to include being necessary and reasonable for the performance of the award and conforming to any limitations set forth in the award.
 - Per [2 C.F.R. § 200.404](#), “A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The question of reasonableness is particularly important when the non-Federal entity is predominantly federally-funded.”

OMB UNIFORM GUIDANCE

- **Maintenance and repair** costs ([2 C.F.R. § 200.452](#)) include “costs incurred for utilities, insurance, security, necessary maintenance, janitorial services, repair, or upkeep of buildings and equipment (including Federal property unless otherwise provided for) **which neither add to the permanent value of the property nor appreciably prolong its intended life, but keep it in an efficient operating condition.** Costs incurred for improvements which add to the permanent value of the buildings and equipment or appreciably prolong their intended life must be treated as capital expenditures.”
- Per [38 CFR 61.30](#), VA provides “per diem funds to offset operating costs for a program of supportive housing or services.” Capital improvements are not an allowable use of per diem funds.
- **Indirect costs** ([2 C.F.R. § 200.412-415](#)) are allowable if supported by a Federally Negotiated Indirect Cost Rate Agreement (NICRA) or if the applicant is eligible for the de minimis rate of up to 10% of modified total direct costs as described in [2 C.F.R. § 200.414](#). Otherwise, all requested costs must be direct costs.
- Grantees must retain **all** supporting documentation to substantiate costs allocated to the grant (e.g., invoices, timecards, contracts, bids)

OMB UNIFORM GUIDANCE

- **Compensation** ([2 C.F.R. § 200.430](#))
 - Grantees must have written protocols (e.g., employee handbook, organization compensation policy) documenting the policy for determining the types of payments consistent with the organizations standard business practices.
 - Ensure “compensation is reasonable for the actual personal services rendered rather than a distribution of earnings in excess of costs” ([2 C.F.R. § 200.430\(g\)](#)).
 - Incentive compensation ([2 C.F.R. § 200.430\(f\)](#)) is “allowable to the extent that the overall compensation is determined to be reasonable and such costs are paid or accrued pursuant to an agreement entered into in good faith between the non-Federal entity and the employees **before** the services were rendered, or pursuant to an established plan followed by the non-Federal entity so consistently as to imply, in effect, an agreement to make such payment.”

- VA considers the incurrence of costs (per diem), which may unjustifiably increase the Federal award's cost, unallowable ([2 C.F.R § 200.410](#)).

NONPROFIT GOVERNANCE

- Many grantees are nonprofit organizations - 501(c)(3) or 501(c)(19) - that are governed under the [Internal Revenue Service](#) requirements.
- It is generally expected that a nonprofit has an **Independent board of directors** with fiduciary responsibility for:
 - Ensuring prudent use of all assets (e.g., facilities, people)
 - Ensuring that the nonprofit's activities and transactions are advancing its mission.
 - Recognizing and disclosing conflicts of interest.
 - Making decisions that are in the best interest of the nonprofit corporation; not in the best interest of the individual board member (or any other individual or for-profit entity).
 - Making sure the nonprofit obeys applicable laws and regulations.
- Organizations should be aware of the [IRS's rebuttable presumption test](#) when determining compensation of executives.
- Governing boards should be composed of persons who are informed and active in overseeing a charity's operations and finances.

OBO FISCAL REVIEWS AND MONITORING

- GPD National Program Office secures the services of VA's Office of Business Oversight (OBO) to support our financial oversight and monitoring responsibilities.
 - VA audit staff and contractors conduct onsite and virtual fiscal reviews of grantees.
 - Review SF425's and supporting documentation.
 - Assess compliance with A-133 audit requirements.
 - Negotiate indirect cost rates.
- VA continues to invest in financial oversight resources as one way to mitigate the increased risk associated with substantially elevated per diem rates.
 - All grantees should be prepared for an onsite fiscal review from OBO.
 - Make sure you have qualified staff that understand the requirements outlined in the Uniform Guidance (2 CFR 200) to properly manage your Federal funding.
 - Ensure your organization has written standard operating procedures (SOPs) related to your management of funds. Routinely review and update these documents, as appropriate.
 - Regularly evaluate your per diem rate and make appropriate adjustments.

OBO FISCAL REVIEWS AND MONITORING

- **Risk management** ([2 C.F.R. § 200.206](#))
 - OBO supports GPD's framework for evaluating the financial risks posed by grantees. This assessment may include:
 - Financial stability
 - Management systems and standards
 - History of performance
 - Audit reports and findings
 - Ability to effectively implement requirements
- Some GPD grantees will be **subject to special conditions** based on the assessed risk. Special conditions may include:
 - **Quarterly** Federal Financial Report (SF-425) documenting actual costs incurred.
 - OBO review of sample expenses quarterly to ensure that they reconcile to the general ledger or appropriate documentation is being retained.
 - More frequent onsite fiscal reviews and monitoring by OBO.

OBO FISCAL REVIEWS AND MONITORING

- Coming Soon:
 - OBO review of grantee financial management health (online questionnaire)
 - Technical assistance
- Fiscal Questions may be sent to GPDfiscal@va.gov

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OFFICE OF BUSINESS OVERSIGHT

- **Federal Contractors:**
 - Trilogy, BDO, RMA & Associates
- **Upcoming Fiscal Reviews:**
 - Carrfour Supportive Housing, Inc. – October 17-21, 2022
 - United Way of Broward County, Inc. – October 17-21, 2022
 - First at Blue Ridge Inc. – October 18-20, 2022
 - Erie United Methodist Alliance – October 18-20, 2022
 - Community Partnership for the Homeless, Inc. dba Green Doors – October 31 – November 4, 2022
 - Santa Maria Hostel, Inc. – October 31 – November 4, 2022
 - Veterans Accession House – October 31 – November 4, 2022
 - The Salvation Army California Modesto Corps – October 31 – November 4, 2022
 - Operation Welcome Home – October 31 – November 4, 2022
 - Goodwill Industries of Northern Michigan, Inc. – October 31 – November 4, 2022
- **OBO Hot Topics:**
 - FY22 funds unobligated as of 9/30 must be returned
 - Purchases/Maintenance over 5k needs approval
 - High Risk Grantees
 - Monitor Budget
 - Fiscal Questions email GPDFiscal@va.gov
- **OBO Annual Training:**
 - First quarter of the new fiscal year



REMINDER: ANNUAL INSPECTIONS



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GPD TRANSITIONAL HOUSING ANNUAL INSPECTIONS

- Annual reinspections of all GPD transitional housing must be completed by December 31st
 - **The December 31st deadline means all deficiencies are resolved**
- Plan with your VA medical center liaison team now
 - Please review August's GPD operational call for strategies on coordinating successful inspections
 - <https://www.va.gov/HOMELESS/docs/GPD/providers/OperationalWebinar-2022August-FINAL.pdf>

FY 2023 CHANGES TO PERFORMANCE MEASURES



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FY 2023 PERFORMANCE MEASURES UPDATES

- **FY 2023 performance *targets* will remain the same for all housing models**
 - For example, Clinical Treatment measures
 - Discharge to permanent housing is 65 percent
 - Employment of individuals at discharge is 55 percent
 - Negative exits are less than 20 percent
- **Reminder: All performance targets for all GPD models are listed in the original **notice of funding** and the **Transitional Housing Grant Recipient Guide****
 - https://www.va.gov/HOMELESS/GPD_ProviderWebsite.asp

FY 2023 PERFORMANCE MEASURES UPDATES

- **Two changes for metric exclusions and inclusions**
 1. **Excluded: Exits to VA MH RRTP will be excluded from the metric**
 - [MH RRTP](#)? (Mental Health Residential Rehabilitation Treatment Programs)
 - Includes VA Domiciliary
 2. **Included: Veterans' ineligible for VA healthcare will be included in the measure**
(e.g., other-than-honorable discharged Veterans)
- **Reminder: Grantees are encouraged to re-engage Veterans in services if they leave the program unsuccessfully (e.g., AWOL)**
 - If re-entry into the same GPD project occurs in a relatively short period of time VA liaisons **may void the discharge** (i.e., potentially fewer exits for grantees)

NOT EVERY VETERAN COUNTS TOWARDS EVERY MEASURE

- **Work with GPD liaisons to understand exclusion/inclusion measures**
 - Not every Veteran discharge will count towards each performance measure
 - Each model and its measures have specific Veteran requirements
 - For example, in Bridge Housing, a discharge does not count towards performance measurements if
 - *Veteran has a length of stay of seven days or less*
 - *Veteran is deceased at discharge*
 - *Veteran is placed into a hospital or another residential nonpsychiatric medical facility, long-term care facility or nursing home, or psychiatric hospital or other psychiatric facility*
 - *Veterans who have been discharged from GPD programs due to threatened/actual violence to self or others*

WORK WITH GPD LIAISONS TO DIAL IN PERFORMANCE

- **GPD liaisons should be reviewing with you**
 - Technical Manual: Homeless Performance Measures
 - Your model-specific goals and results
 - Performance improvement planning
 - Striking the balance between most vulnerable Veterans and continuous quality systems improvement (i.e., mission v. measure)

- Conversation spark: *I would love to learn more about the performance measures. Could we set up some time to review the VA Technical Manual together and talk about how we can work more closely?*

QUESTIONS?

*Thank
You*

Next Call: Tuesday, November 8th @ 2pm EDT



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