



Grant and Per Diem Program COVID-19 Per Diem Waiver Call

Jeff Quarles, MRC, LICDC
National Director, GPD

Chelsea Watson, MSPH
Deputy Director, GPD

Agenda

1. CARES Act Legislative Change
2. Guidance for Grantees; Allowable Costs
3. How to submit a Per Diem Rate Change Request
4. FAQ's
5. Final Thoughts



CARES ACT:

Per Diem Rate Change

- CARES Act allows the Secretary to waive any limits on the rates of per diem payments
- GPD is *temporarily* removing the existing cap on per diem rates for PDO, TIP, and Service Center grants
- Per diem rate increases are **not** automatic; grantees must submit a rate request
- Increases may be effective as early as March 27, 2020

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.



CARES ACT:

Per Diem Rate Change

- Notice to Grantees
 - How to submit a per diem rate request
- Frequently asked questions
- Completing GIFTS requirements
- Additional guidance

Grant and Per Diem Program CARES Act: Per Diem Rate Change

On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security (CARES) Act (P.L. 116-136) passed and Congress allocated additional funding to VA in support of COVID-19 efforts. One provision of this legislation was the ability for the Secretary to temporarily increase per diem payments to eligible entities in response to the current public health emergency. VA's Grant and Per Diem (GPD) Program is temporarily removing the existing cap on per diem rates for PDO, TIP, and Service Center grant awards.

HOW TO SUBMIT A PER DIEM RATE REQUEST

Per diem rates increases must be requested by completing the GIFTS Requirement that has been assigned for each of your GPD grants. Increases are **not** automatic, and grantees must incur **sufficient** costs to support the rate requested. **Do not** email rate increase requests directly to our GPD team. Your agency's *GIFTS Account Holder* has been issued a Per Diem Rate Request Requirement to complete.

Step 1: Go to the GPD [Per Diem Rate Request website](#)

Step 2: Download the *Per Diem Rate Request Worksheet and Instructions* that correspond to your GPD project (PDO, Service Center, TIP)

Step 3: Complete the *Per Diem Rate Request Worksheet*, per the instructions

Step 4: Have your agency's *GIFTS Account Holder* access the GIFTS Requirement for each of your grants and complete the requested information

FREQUENTLY ASKED QUESTIONS

What is the earliest effective date of my rate increase request?

March 27, 2020, the date the CARES Act was enacted.

What is the maximum rate I may request?

Transitional housing projects, both Per Diem Only (PDO) and Transition to Place (TIP), may request a maximum of \$99.82. Service centers may request a maximum of \$12.48 per hour.

By what date do I have to submit my rate increase request to have my increase backdated to March 27, 2020?

Grantees that properly submit their per diem rate request through the GIFTS Requirement by May 31, 2020 may have their rate increases backdated to March 27, 2020. Grantees will indicate their requested start date on their Per Diem Rate Request Worksheet. Some grantees, for accounting purposes, may choose for their increases to begin April 1, 2020.

What would be my start date if I submit my rate increase request June 1, 2020 or later?

Requests received June 1, 2020 or later would be the first of the month following the month the properly submitted request was received. For example, a request submitted June 1, 2020 would have an effective date of July 1, 2020.

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CARES ACT:

Per Diem Rate Change

WHAT COSTS CAN BE CHARGED TO PER DIEM?

- Grantees able request per diem to cover 100 percent of the cost of care, minus other sources of income
- Funding intended to support the additional operating costs associated with serving Veterans during COVID-19
- Grantees may allocate all traditionally allowable operating costs, in addition to costs incurred to provide Veterans with safe isolation spaces



WHAT ARE EXAMPLES OF ALLOWABLE COSTS?

- Costs include, but are not limited to, the following:
 1. Costs associated with additional space, or social distancing strategies in GPD transitional housing facilities;
 2. Costs associated with isolation strategies for Veterans that are vulnerable or symptomatic (e.g., temporary use of hotel/motel rooms to isolate Veterans);
 3. Overtime for staffing costs to provide coverage;
 4. Cleaning supplies to ensure facilities are appropriately disinfected;
 5. Toiletries to support hand washing hygiene for Veteran participants;
 6. Ensuring food security and transportation needs for homeless Veterans; and
 7. Personal protective equipment for staff and/or Veterans with symptoms.



MONITORING PROGRAM COSTS

- Must incur sufficient costs to support the rate requested
- Must monitor costs at least monthly to ensure rate remains accurate
- Per diem requests should be made based on *the overall costs*, per FAIN
- Costs must be reasonable and cannot exceed the scope of the grant
- Ensure compliance with the OMB Grants Management Circulars:
 - Factors Affecting Allowability of Costs ([2 CFR 200.403](#))
 - Reasonable Costs ([2 CFR 200.404](#))
 - Allocable Costs ([2 CFR 200.405](#))



Motel/Hotel Costs

- Time-limited option to provide isolation/quarantine spaces for symptomatic or vulnerable Veterans
- Need to be strategic with motel/hotel agreements around length of time, cost per night, and method of payment
- Costs are to be reasonable and customary for their geographic area
- Grantees should maintain documentation that rates paid are reasonable taking into consideration that per diem is a limited resource



CARES ACT:

Per Diem Rate Change

- Per diem rate requests exceeding \$100 per veteran per day will require a second level review related to costs estimates
 - Additional supporting documentation may be required
 - Fiscal review of actual incurred costs will occur
 - Grantees that overbill VA will be indebted
- Per diem payments may be back-dated to March 27, 2020
 - Grantees may indicate a different start date (i.e. April 1, 2020) on the Per Diem Rate Request Worksheet
- Per diem rate requests must be **submitted by May 31, 2020**



How To Submit A Per Diem Rate Request:

- **Do not** email rate increase requests directly to our GPD team.
- Your agency's *GIFTS Account Holder* has been issued a Per Diem Rate Request Requirement to complete
 - Step 1:** Go to the GPD [Per Diem Rate Request website](#)
 - Step 2:** Download the *Per Diem Rate Request Worksheet and Instructions* that correspond to your GPD project (PDO, Service Center, TIP)
 - Step 3:** Complete the *Per Diem Rate Request Worksheet*, per the instructions
 - Step 4:** Have your agency's *GIFTS Account Holder* access the GIFTS Requirement for each of your grants and complete the requested information



CARES ACT:

Monthly Per Diem Billing

- Imperative to submit timely and accurate billing each month (vouchers / daily census)
- Submit voucher within 7 days after end of the billing period
- Timely invoicing is important for the sustainment of this financial resource
- Will monitor and report on per diem payment amounts as well as utilization rates (occupancy)
 - Funding intended to enable grantees to more fully utilize authorized beds
 - Is your agency able to serve homeless Veterans being released from the hospital?



Can my higher per diem rate include the cost of hotel/motels to facilitate isolation or social distancing of Veteran?

- Yes, this increased funding is intended to support additional costs incurred to provide safe and appropriate housing for Veterans. This would include the use of hotel/motels.

My regular operating costs are higher than the per diem rate I receive from VA. Can I use these funds for my traditional operating costs?

- Yes, VA may pay up to 100 percent of allowable costs of care, minus any other sources of income. If this cost is higher than what you are currently receiving from VA then you may receive a rate increase to cover this costs (remember this increase is only temporary)



For how long is my “temporary” per diem rate increase in effect?

- GPD has received approximately \$88M in CARES Act funding which we are using to support increased per diem rates.
- The uncapped per diem rate is subject to further revision at some later point based on changes in legislation or availability of funding. Should this occur, grantees will be notified.
- Additionally, the Secretary has the authority to rescind the per diem limit waiver at any time to control costs, if needed.

What is the maximum rate I may request?

- There is no maximum rate. Grantees may only charge for allowable, allocable, and reasonable costs that are within the scope of what they have been authorized to provide, per their grant application and GPD regulations



CARES ACT:

Per Diem Rate Change - FAQ's

May I increase the number of GPD beds that I am authorized to provide under my GPD grant?

- No, rate increase requests are to be based on your agency's current bed authorization.

Can I bill this new per diem rate for Veterans that are absent from the program, per the recent Veteran Absence CARES Act guidance?

- Yes, however grantees should closely monitor their actual costs to ensure their per diem rate remains accurate, especially when billing for a bed that they are holding for a Veteran.

My GPD operating costs were in excess of my approved per diem rate from October 1- March 26. Can I use the per diem waiver to recoup actual costs incurred prior to the enactment of the CARES Act?

- No. This funding is available to support additional costs from the date of enactment of Cares (March 27, 2020) and is available until the end of the national public health emergency or until VA rescinds the per diem waiver, whichever occurs first.



CARES ACT:

Per Diem Rate Change - FAQ's

Is GPD able to pay per diem for empty beds?

- No. GPD can pay for Veteran absences under certain conditions, per the [CARES Act Guidance](#) distributed April 7, 2020. This funding is intended to help grantees maximize their bed utilization.

Can I receive per diem for additional GPD beds?

- At this time, no. If there are additional legislative changes in the future or specific needs for beds related to the Stafford Act this could change.



Final Thoughts

- Unprecedented times requiring all of us to explore new strategies and be innovative with our problem solving
- We expect that there may be more legislative changes in the future
- GPD is a valuable resource for VA and your community strategy to provide services to homeless Veterans during COVID-19
- Per diem waiver is a unique opportunity that aligns financial resources to support our mission
- Looking for grantees to use this funding to employ the various isolation options discussed on previous webinars and to maximize bed capacity to serve Veterans
- Imperative that we are able to demonstrate that this is an effective use of the funds appropriated to VA in order to sustain the resource through this public health emergency.



Many thanks for all you are doing for Veterans!

