

# GRANT AND PER DIEM (GPD)

## Case Management Program

### Grantee Guide

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#### **OVERVIEW**

Congratulations on your successful case management grant application. The following guide has been developed to assist your organization. The information presented in this guide is to be used as a reference only and is not meant to take the place of the GPD Program regulations or other statute or governing law. We hope you will find these guidelines helpful. Our intention is for you to work closely with your appointed Department of Veterans Affairs (VA) GPD liaison to develop the best possible partnership to serve those Veterans in your program.

The Veterans we serve together have complex and unique needs. We encourage you to remain flexible, eliminate barriers to admission and continually work to engage Veterans in your programming, viewing relapse not as the end of treatment but instead as a part of the recovery process.

#### **1. Understanding the Case Management Grant**

The GPD Case Management (CM) grant provides grant funding for time-limited case management services. The goal is to improve the retention of housing by Veterans who were previously homeless

and are transitioning to permanent housing from programs such as GPD or VA's Healthcare for Homeless Veterans (HCHV) Contracted Residential Services (CRS) Program.

Some of these Veterans may not have been in a GPD or HCHV program previously and may be coming from a non-VA transitional housing program. In addition, the timing of the referral to the Case Management Program may come when a Veteran is not yet in permanent housing or when a Veteran has been in permanent housing for some time but is at risk of losing this housing. The GPD Case Management Program does not serve Veterans who are receiving case management services from permanent supportive housing programs such as HUD-VASH, or from rapid re-housing/homeless prevention programs such as Supportive Services for Veterans Families (SSVF). Please note if the Veteran is receiving financial assistance only from SSVF, they may also be enrolled in the GPD Case Management Program.

In general, the grant funds may be used for the following:

- Case management staff
- Transportation for case manager (e.g., vehicle lease)
- Cell phones and computer for case manager to facilitate service
- Office furniture for case manager
- The award cannot be used to facilitate capital improvements or to purchase vehicles or real property

There is a 6-month time limit for Veterans to receive case management services. However, VA may approve a request to extend services beyond the 6-month period if an organization submits a request to the liaison in writing and the liaison approves it before the 6-month time limit expires.

In the grant application the grantee was asked to provide an overview of the following:

- The referral/acceptance process and outreach plan
- How Veterans' needs will be assessed
- A basic description of the case management services being provided
- How to ensure Veterans retain their housing
- How Veteran education will be provided
- How often grantees will meet with Veterans and what type of contacts they will have
- What types of resources will be provided for case managers
- How grantees are equipped to provide crisis intervention services
- The plan for phasing out case management services
- The involvement with the Coordinated Entry System (CES)

Case management services that grantees can provide include but are not limited to:

- Home visits to monitor housing stability
- Providing/coordinating educational activities
- Meal planning
- Tenant responsibilities
- Use of public transportation
- Referrals to needed services, such as mental health, substance use disorder, medical and employment services
- Financial management
- Development of natural supports

- Participation in case conferencing with other service providers who are working with the Veteran

Please Note: It is very important that if no one in your agency has the expertise in complying with these requirements, you secure the services of a professional in that capacity.

## **2. Understanding the Grantee Role and Responsibilities with the Case Management Grant**

It is expected that the grantee is familiar with the GPD regulations, the CM grant regulations, the grant application and any subsequent approved Changes of Scope. Regulations are available on the GPD website: <https://www.va.gov/HOMELESS/GPD.asp>.

Grantees are encouraged to seek to employ formerly homeless Veterans in positions created for purposes of the grant.

CM grantee responsibilities include:

- Provide services described in the grant application
- Ensure CM grant staff receive suicide prevention training
- Complete the monthly *GPD Case Management Caseload Tracking Tool* and submit it to the GPD liaison via encrypted email within five business days after the end of each month
- Participate in quarterly reviews with the GPD liaison and address concerns as they arise
- Follow up with critical incidents/sentinel events
- Navigate VA systems and request guidance if needed
- Complete corrective action when relevant
- Request prior approval for extensions if needed
- Maintain administrative files and Veteran case files

Please note that if there are multiple grantee staff members involved with one grant it is imperative that there is an effective system of communication in place. This is necessary to ensure knowledge by all involved staff members of current grant status, issues, successes and next steps. It also is important to convey these systems and processes to the GPD liaison so they know who their point of contact is.

## **GRANT ADMINISTRATION & OVERSIGHT**

### **1. Administrative File**

The administrative file maintains documentation associated with the grant award. The administrative file can be either paper or electronic. The method is determined by the grantee. The file must be accessible by all relevant staff. Grantees must ensure the confidentiality of records maintained on Veterans receiving services under the grant.

The below must be maintained in the administrative file:

- A copy of the original grant application
- Change of Scope requests and responses from the GPD National Program Office
- Monthly *GPD CM Caseload Tracking Tool* (this item is electronically stored)
- *GPD CM Quarterly Review Forms* provided by the GPD liaison
- Corrective Action Plan correspondence
- Other correspondence involving the grant with the GPD National Program Office, the liaison or the VA medical center (VAMC)

## 2. Case File

The case file is a record of case management services for an individual Veteran. The case file can be either paper or electronic. The method is determined by the grantee. The file must be accessible by all relevant staff. Grantees must ensure the confidentiality of records maintained on Veterans receiving services under the grant.

The below must be maintained in the case file:

- Veteran information, including at minimum:
  - Verification of eligibility status (i.e., SQUARES report, DD214)
  - Family status
  - Employment history
  - Education and marketable skills/licenses/credentials
  - Mental health and substance use history
- Case management notes
- Individual service plan (ISP), updated quarterly, including at minimum:
  - Barriers
  - Service needs
  - Strengths
  - Specific services provided including duration and outcome
  - Documentation of referrals
  - Benefits to be achieved as a result of program participation (individualized goals per participant)
- Documentation of an extensions beyond the original six months for case management services
- Incident reports of sentinel events within 24 hours of occurrence
- Documentation of multiple entries

## 3. Data & Reporting

The grantees are responsible for maintaining data around caseloads. You will provide data to the liaison monthly using the *GPD CM Caseload Tracking Tool*. The *GPD CM Caseload Tracking Tool* and the *GPD CM Caseload Tracking Tool Data Dictionary* are available on the GPD provider site: [https://www.va.gov/HOMELESS/GPD\\_ProviderWebsite.asp](https://www.va.gov/HOMELESS/GPD_ProviderWebsite.asp).

## 4. The Monitoring Process & Quarterly Reviews

Grantees who have worked with GPD in the past will notice that the monitoring process for case management grants is different from the monitoring process for transitional housing grants. For example, HOMES entries and exits are not required and there is no annual inspection that involves coordination of an inspection team.

The grantee is expected to participate in a quarterly review with the GPD liaison. The review will include an evaluation of the grantee's performance regarding clinical quality and grant compliance.

Reviews are to be completed by the end of January, April, July and October. GPD liaisons will provide a copy of the quarterly review and the grantee should add it to the grant administrative file. Grantees are reminded of their responsibility to protect Veterans' privacy. The *GPD CM Quarterly Review Form* can be found on the GPD provider site:

[https://www.va.gov/HOMELESS/GPD\\_ProviderWebsite.asp](https://www.va.gov/HOMELESS/GPD_ProviderWebsite.asp).

The liaison will conduct these reviews in person at the office location of the case manager where the grantee's administrative records are stored.

The quarterly review will include the following:

- 1) Conversation with the grantee and documentation review to evaluate:
  - Grant compliance
  - GPD regulation adherence
- 2) Case file review to evaluate:
  - Proof of eligibility is present
  - Extension waivers are present
  - The quality of services provided
  - Optimal documentation standards
  - Grant compliance
  - A match with information on the *GPD CM Caseload Tracking Tool*
- 3) Interviews with Veterans to evaluate:
  - Level of program satisfaction
  - Accuracy of information reported by the grantee
  - Any concerns that may require corrective action
  - Grant compliance

#### Case File Review:

The grantee provides to the liaison the *GPD CM Caseload Tracking Tool* each month. During the case file review, the liaison will look for any trends, provide feedback on performance, choose Veteran case files to review and choose Veterans to interview. The grantee will make available to the liaison any ten case files to review per case management position as selected by the liaison. If there are not ten files to review, the grantee will make available to the liaison all of the files for that case management position.

#### Veteran Interview:

The grantees will support the GPD liaison's need to conduct Veteran interviews. The grantee will inform Veterans of the possibility of interviews with liaisons. Veterans must be made aware that their participation in interviews is voluntary. Grantees will help coordinate schedules with the liaisons and the Veterans as needed. Veteran interviews may be conducted over the phone or in person, keeping Veteran preference in mind.

Deficiencies, needs for corrective action, challenges and successes are documented by the liaison. Corrective action requests must follow the corrective action protocol outlined in this guide.

When the quarterly review is complete, the grantee will receive a copy of the report from the liaison and will store it in the administrative file.

### **5. Interactions with GPD, GPD Liaisons & Veterans**

When communicating with GPD or with anyone at VA, it is essential that all correspondence includes the Federal Agency Identification Number (FAIN) assigned to your grant.

The FAIN is broken into 6 parts which uniquely identify your grant. Below is an example FAIN to better understand the numbering convention.

Example FAIN: ABCD222-0999-544-CM-20				
Unique Agency Identifier	Project Number	VA Station Number	Grant Program (case management)	Year of Initial Award
ABCD222	0999	544	CM	20

Grantees must check the GPD provider website monthly. This ensures your organization is following the most current procedures and is aware of all available guidance. The GPD provider website is: [https://www.va.gov/HOMELESS/GPD\\_ProviderWebsite.asp](https://www.va.gov/HOMELESS/GPD_ProviderWebsite.asp).

Grantees must attend monthly conference calls conducted by GPD for all current grantees. These calls are used to offer you updated information and answer your questions. Unless otherwise communicated these calls occur on the 2<sup>nd</sup> Tuesday of the month at 2 pm Eastern Time. Audio is available via VANTS on 1-800-767-1750 Access Code, 17663#. It is expected that a representative from each awarded organization attend.

With the GPD CM grant, the GPD liaison's relationship with the grantee is primarily a monitoring one. The grantee has the primary responsibility for working directly with Veterans except for quarterly review interviews conducted by the GPD liaison.

An exception to this may occur in the case of a sentinel event. As clinically indicated, when the grantee reports a sentinel event to the liaison, the liaison should outreach to the Veteran to ensure that assessment of risk and appropriate referrals for services occurs. The grantee may receive from the liaison assistance in the form of referrals for services, care coordination or crisis intervention. The grantee and the liaison should coordinate as needed.

It is expected that the grantee navigates VA systems independently. However, if assistance is needed, grantees should ask the liaison for guidance, as appropriate.

## 6. The Extension Process

The maximum length of time the Veteran is expected to be in the Case Management Program is six months. Sometimes there are individual circumstances that warrant the Veteran remaining in the program for longer than six months. The grantee will consult with the liaison prior to the end of the 6-month period when considering an extension. The liaison may consider approving extensions of up to three additional months at a time and will use clinical judgment when making this decision. Grantees should communicate with the liaison to find out the liaison's expectations for these consultations (e.g., the request must come through encrypted email, the request must include the FAIN, the request must be from an authorized representative of the grantee organization).

Considerations for Extensions:

- Will the extension help the Veteran achieve the goals in their ISP?
- Is the extension in the best interest of the Veteran?
- Is there a strong likelihood that this extension would allow the Veteran to successfully maintain his current permanent housing situation?
- Is the extension of a relatively short duration?
- Is this the appropriate program for the Veteran or is there a more suitable option?

The grantee must be available for consultation if the liaison determines it is warranted. The grantee will receive an encrypted email from the liaison, noting approval or disapproval of the extension. The grantee must maintain this documentation in the Veteran's case file.

## **7. Billing**

The grant award amount for the entire 24-month grant award period is on the first page of your grant agreement. The GPD National Program Office makes payments to grantees for services rendered through the Department of Health and Human Services (HHS) Division of Payment Management System. Payments are made to the appropriate vendor account associated with the Employer Identification Number (EIN) and Data and Universal Numbering System (DUNS) indicated by the applicant on their Application for Federal Assistance (SF-424). VA provides all funds to the grantee by the start date on the grant agreement. Generally, grantees will access funds twice per month and must maintain minimum federal cash on hand by requesting funds only for immediate reimbursement (3 business days).

For any questions related to billing or payments for your case management grant, grantees should contact the GPD National Program Office at: [GPDfiscal@va.gov](mailto:GPDfiscal@va.gov).

To request new access for a person that does not have access to the Payment Management System, you can go to our webpage <https://pms.psc.gov/> and under the Secure Payment Management System Login Box, click Request Access. The instructions can be found at the following URL: <https://pms.psc.gov/grant-recipients/access-newuser.html>.

To update access for a person that already has access to the Payment Management System, you can log into the Payment Management System and enter the request to update access. The instructions can be found at the following URL: <https://pms.psc.gov/grant-recipients/access-changes.html>.

The instructions for adding banking information, can be found at the following URL: <https://pms.psc.gov/grant-recipients/banking-add-change.html>.

Grantees must maintain an active account with [www.SAM.gov](http://www.SAM.gov) at all times during the award period. Grantees must also ensure that any subrecipients provide their DUNS number to you prior to beginning a subaward.

### **Financial reporting:**

The case management grantee will provide all required financial reporting to support their billing activity.

Grantees must submit a financial requirement to GPD through GPD's online grant management system (i.e., GIFTS) on a quarterly basis in January, April, July and October.

- Quarterly requirements are due no later than 30 days after the end of each fiscal year quarter (i.e., no later than 30 day after September 30th, December 31st, March 31st and June 30th).
- When a requirement is due to GPD, a notification will be emailed from the GIFTS system to the person at the grantee organization who is designated as the GIFTS account holder.
- Grantees must follow the instructions provided in the email to submit the requirement electronically through GIFTS.

- For information about the GIFTS system and user roles, refer to the GIFTS user guide found on the GPD website or go directly to:  
[https://www.va.gov/HOMELESS/docs/GPD/GIFTS\\_User\\_Guide\\_CM.pdf](https://www.va.gov/HOMELESS/docs/GPD/GIFTS_User_Guide_CM.pdf).
- A link to the GIFTS grant portal is available on the GPD provider page of our website or go directly to: [https://www.grantrequest.com/sid\\_5937?sa=am](https://www.grantrequest.com/sid_5937?sa=am).

Also, grantees must submit the SF-425 Federal Financial Report (FFR) to GPD by emailing the form to [GPD425@va.gov](mailto:GPD425@va.gov) on an annual basis by the end of December.

- Annual FFRs are due no later than 90 days after the end of each fiscal year (i.e., no later than 90 days after September 30<sup>th</sup>).
- One FFR is required per grant award FAIN and the FAIN must be entered on the FFR.
- The FFR must be signed by the appropriate official at the grantee organization.
- VA reserves the right to freeze access to grant funds when an FFR is overdue.
- If for some reason your agency withdraws from the grant or is terminated, a final FFR will be due. The final FFR is due no later than 90 days after the date of withdrawal or termination. If you find that you have overages DO NOT include a check for that amount with your FFR. If the FFR indicates funding is due to be returned, our office will initiate a formal Notice of Indebtedness with instructions on how and where to send payment or request waivers of debt.
- A link to the FFR as well as additional information is available on the GPD provider page of our website: [https://www.va.gov/HOMELESS/GPD\\_ProviderWebsite.asp](https://www.va.gov/HOMELESS/GPD_ProviderWebsite.asp).

Generally, grantees are expected to use grant funds on a consistent basis throughout the two-year award period. Grantees who exceed 35% of the grant award in the first fiscal year quarter, or who exceed approximately 10% of the grant award in each fiscal year quarter thereafter, may have their funds temporarily frozen until the beginning of the next quarter. VA reserves the right to adjust access to funds based on a variety of factors including performance.

All financial reports must be accurate. Supporting documentation must be maintained and made available for VA review upon request. Grantees are encouraged to monitor their requests for funding closely. It is the grantee's responsibility to initiate timely communication with the liaison, with GPD and/or with the Payment Management System representatives about questions or problems.

Grantees must establish procedures for accounting with respect to the grant. You are required to follow all guidelines and laws for receiving federal grants. Not only federal law but also state and local laws may apply. Additionally, audit requirements must be followed as set forth in the Office of Management and Budget (OMB) Circulars (available on our website).

Grantees must ensure that all operational costs assigned to the grant are allowable and charged in accordance with GPD Program Regulations and the applicable OMB Circulars. Approval of payments does not constitute approval of individual costs charged as part of the payment. If VA subsequently determines through a fiscal review or audit that costs were not charged appropriately, VA may issue a Letter or Indebtedness to collect for the over-billing. Submission of budgets or other information as part of your grant application or through subsequent changes of scope does not constitute approval for charges that violate program regulations or OMB Circulars. Your agency must track costs by each FAIN. In addition, your agency is advised it must meet the requirements of 38 CFR 61.66 Financial Management.

## 8. Eligibility

The grantee is responsible for verifying Veteran eligibility for the GPD Case Management Program and are expected to utilize SQUARES to determine eligibility.

NOTE: Grantees

Grantees are expected to keep a copy of the confirmation from SQUARES that the Veteran is eligible in the Veteran's case file. The grantee must make this information available to the liaison when doing case file reviews during the quarterly review or upon request.

Though the grantee is utilizing SQUARES to determine eligibility, grantees should still assist the Veteran with procuring a DD214 and store a copy of it in the case file.

Permission to access SQUARES requires a greater level of review and requires users from community organizations to verify their identity. Community organizations serving Veterans will need to apply to access SQUARES. If the grantee is having trouble verifying a particular Veteran's eligibility, they may ask a Veteran for records. If there are questions about SQUARES. Grantees should refer to this website: [www.va.gov/homeless/SQUARES](http://www.va.gov/homeless/SQUARES).

## **9. Requesting Corrective Action**

Corrective action is required when a grantee is not adhering to the grant. A deficiency identified at any time, for example during a quarterly review, does not automatically trigger the corrective action process.

If the need for corrective action is discovered at a quarterly review the liaison will note the deficiency in their report, along with the date of correction. If the need for corrective action is discovered outside of the quarterly review, the grantee should obtain from the liaison a letter noting the deficiency and what is needed to correct the deficiency within a specific time period. Typically, grantees are allowed 30 days to correct deficiencies depending upon the severity and provided there is no immediate danger to the safety of Veterans.

Corrective Action Plan:

Corrective action plan letters ideally do not come as a surprise to the grantee. The liaison should discuss any findings verbally immediately upon discovery and provide the grantee the opportunity for correction. Quarterly reviews lend themselves to discussion of any grant compliance or performance issues. Grantees should include their leadership, not just the case managers, in the discussions.

Payment Withhold/Suspension:

Should you fail to provide an acceptable corrective action plan. A letter withholding and then suspending grant payments may be issued. If funds are withheld, and the situation is corrected, the grantee may be paid the funds withheld for the services rendered. However, if funds are suspended, even though the situation is corrected, the grantee will not be paid for those services rendered during the suspension period. Payments may be reinstated from the date of satisfactory correction. As a last resort, projects can be terminated. The GPD National Program Office is the office of primary responsibility for the termination of a GPD award. When termination occurs, VA will conduct a complete audit to determine if any funds are due the government.

## **10. Changes Related to the Grant**

Significant changes in key staff positions require notification in writing to the GPD National Program Office such as a change in the two primary points of contact (e.g., executive director). Grantees must maintain accurate contact information in their GIFTS account at all times during the grant period. For

information about the GIFTS system and user roles, refer to the GIFTS user guide found on the GPD website or go directly to: [https://www.va.gov/HOMELESS/docs/GPD/GIFTS\\_User\\_Guide\\_CM.pdf](https://www.va.gov/HOMELESS/docs/GPD/GIFTS_User_Guide_CM.pdf).

Programmatic changes require both notification and approval from the GPD National Program Office. Changes in site and scope (program design, staffing, and/or services) need to be reviewed and approved by our office prior to the change being implemented. Unauthorized changes may result in progressive sanctions. The grantee should work with the liaison early on in submitting a change of scope request to the GPD National Program Office. Generally, responses to requests for changes of scope are completed by the GPD National Program Office within 30 days of submission.

### **11. Veterans with Multiple Case Management Program Entries**

There are no regulations limiting episodes of care pertaining to the GPD CM grant. A Veteran is allowed to enter the GPD Case Management program multiple times if needed. Prior to admitting the Veteran another time, it is advised that the grantee assess the reasons for the need for another program entry and determine if there is another program that may better suit the Veteran.

The grantee should take the following into account when working with Veterans with multiple program entries:

- Find out why the Veteran was not successful during prior enrolments in the program
- Discuss what is different now
- Discuss ways in which the Veteran's treatment plan goals can help with housing retention
- Focus your case management efforts on assisting with specific barriers to housing retention
- Discuss what services would assist the Veteran with avoiding loss of housing

### **12. Special Circumstances**

Suicide Prevention:

VA has established at each VAMC a suicide prevention program. Grantees must ensure staff supported by grant funds are trained regarding suicide prevention and how to address situations in which Veterans demonstrate suicidal ideation. Free training may be available, for example: <https://www.psycharmor.org/courses/s-a-v-e/>. Standard operating procedures are to be developed, in consultation with your local VAMC, surrounding suicide prevention. If you need assistance in creating such a component, contact your GPD liaison who will be able to provide you with the necessary VAMC contacts and information. The Veterans Crisis Line can provide immediate assistance and can be reached at: 1 (800) 273-8255.

Incident reports:

At times, situations occur that will require additional reporting actions to the VA GPD liaison. Some examples include Veteran injury, medication overdose or death. Please ensure you have both an internal incident reporting system and that these incident reports are provided to your GPD liaison within 24 hours of the critical incident.

Allegations of Impropriety:

All allegations of impropriety at the provider site by your employees, by VA employees, or by program participants will be immediately addressed and documented through use of the appropriate VA mechanism, (e.g., VA Patient Representative, Quality Management, Board of Inquiry, Office of the Inspector General). This is paramount for the health and safety of the Veterans served. As a condition of your grant, you are required to cooperate with these inquires.

## **COMMUNITY COORDINATION & PARTNERSHIPS**

**GPD/HCHV:**

The grantee is expected to have strong partnerships with GPD and HCHV projects in the community. The majority of Veterans in the GPD Case Management Program will likely have been in GPD or HCHV in the past or are currently exiting from these programs into permanent housing. In the grant application, the grantee outlined how the connection with GPD and HCHV projects in the community work in terms of outreach, referrals and role. It is important that the liaison is familiar with the expectations of the grantee in this area. Time of referral to the Case Management Program will vary. There is a process in place for grantees to track Veterans with an interest in case management who have not yet transitioned to permanent housing. Please note the Veteran cannot be enrolled in the Case Management Program until in permanent housing.

**SSVF:**

Veterans in the Case Management Program may apply to utilize temporary financial assistance (TFA) from the SSVF program. The application packet must be used by GPD grantees providing transitional housing with the support of the GPD Liaison when seeking one-time TFA for literally homeless Veteran households who would remain homeless "but for" SSVF assistance. GPD grantees should be strategic in identifying only Veterans who are most in need of this service such as Veterans with zero income, Veterans who are quickly being placed into housing without time to save, and Veterans with limited resources or supports. This is important because SSVF will not be able to serve every Veteran entering permanent housing. Additionally, funding is based on the SSVF grantee's discretion and is subject to availability.

This packet should not be completed by the GPD Case Management Program grantee unless they are also the transitional housing provider. *This is important because the referral packet should be submitted prior to the Veteran moving into permanent housing.*

Eligible TFA includes Security Deposits, Utility Deposits and in limited circumstances, broker's fees. Additional types of TFA are not available. The packet does not apply to Homelessness Prevention Assistance.

SSVF grantees are not required to serve Veterans entering housing and enrolling in the GPD Case Management Program and will only do so at their discretion as resources are available. *For this reason, it is important that GPD transitional housing grantee(s), the GPD case management grantee(s), the GPD Liaison, and the SSVF grantee(s) meet locally to discuss referral processes, availability of resources and expectations.*

**HUD-VASH:**

Sometimes there are Veterans who were in HUD-VASH previously, graduated from HUD-VASH case management with retention of the voucher and currently need case management services for stabilization. In these cases, the Veteran should be reconnected to HUD-VASH. The local process for reconnection to HUD-VASH case management services should be followed.