

Veterans Health Administration

## Supportive Services for Veteran Families (SSVF) Program

# **Monitoring and Compliance**



### **Compliance Requirements:**

Grantees are responsible for operating programs in accordance with their grant agreements, which require compliance with the following:

- 1. Final Rule
- 2. Notice of Fund Availability (NOFA)
- 3. Applicable OMB Circulars
- Agency application, as approved by SSVF Program Office



### **Ensuring Compliance :**

SSVF Program Office is responsible for monitoring and oversight of grantee programs, as well as providing education and training, which is conducted by the following:

- 1. Review and Analysis of Monthly and Quarterly Reports
- 2. Review and Analysis of Payment Management System (Payment Requests)
- 3. Annual Monitoring (On-Site and Remote)
- 4. National Grantee Calls (Monthly)
- 5. Program Office Email Updates (Weekly)
- 6. Audits



#### **Regional Coordinators are the Grantees' POC for all things SSVF!**

#### Primary responsibilities of Regional Coordinators include:

- Helping grantees understand how to complete the required performance reports
- Helping grantees document participant eligibility, through monitoring
- Helping grantees use the required HMIS reporting tool, and connecting grantees with TA provider when needed
- Helping grantees understand the process for requesting guidance from the Regional Coordinator
- Helping grantees collaborate with subcontractors related to the SSVF grant
- Tracking and reporting grantee progress and inhibitions to SSVF program staff



#### Primary responsibilities of Regional Coordinators include (cont'd):

- Connecting grantees to available resources that can provide assistance with homeless prevention, grants management, and other program related concepts
- Providing assistance in facilitating relationships between VA and Grantees
- Coordinating regional updates regarding upcoming events (conferences, stand downs, etc)
- Visiting regional locations at least once a year but could visit more if requested/required
- Assisting with in depth financial audit, if applicable



### How will grantees interact with Regional Coordinators?

- Regional meetings are hosted each year
- Introductory site visit for new grantees
- Regional calls take place (monthly/quarterly) with grantees
- Annual monitoring visit for all grantees
- Special events, trainings, etc.



## What will the Regional Coordinator monitor during the visit?

- Client case files
- Intake screening
- Verification of participant eligibility (Veteran status, household income, and housing status)
- Policies and Procedures
- Housing stability plan
- Provision of the types of supportive services and, if applicable, types of financial assistance
- Recertification and reassessment (at least once every 90 days for all participants)
- Rent reasonableness determination, if applicable
- Housing inspections, if applicable



### **SSVF** Reporting Overview

- 1. Monthly Dashboards and Repository Uploads
  - Due 5 business days after the end of each month
  - Program Office only accepts HPRP APR from Homeless Management Information System (HMIS)
- 2. Quarterly Performance Reports
  - Due 20 calendar days after the end of each quarter
  - Includes programmatic and financial information (must use VA template)



#### Programmatic Reporting using Quarterly Report Template

- Significant events that have occurred within program during quarter
- Assistance required from SSVF Program Office
- Locations where outreach has been conducted
- List of organizations/entities referring >5% of Veteran families
- Copy of participant screening form being used
- # of ineligible participants screened
- Types of supportive services provided
- Most requested supportive services (top 3)
- Types of temporary financial assistance provided
- Any participant safety issues that arose
- Program goals and outcomes
  - 1. Best practices
  - 2. HMIS data entry
  - 3. Notable cases
- Grant agreement compliance



### Financial Reporting using Quarterly Report Template

- Actual expenditures during quarter (compared to estimated costs)
- Explanation of any variances
- Subcontractor expenses
- Total funding drawn down compared to total funds expended

SSVF website includes Companion Guide to Quarterly Reports with instructions on how to complete the templates.



#### **Changes to Program throughout grant cycle:**

- <u>Significant Changes</u> submit written request to Regional Coordinator BEFORE implementing a significant change; if VA agrees, will issue written approval
- Examples:
  - Change in grantee or any identified subcontractors
  - Change in area or community served
  - Additions or deletions of supportive services being provided
  - Change in **budget line items** more than 10% of grant award
- <u>Key Personnel Changes/Address Changes</u> inform Regional Coordinator within 30 days
- <u>Corrective Action Plan (CAP)</u> SSVF Program Office may require CAP if:
  - On a quarterly basis, actual grant expenditures vary from amount disbursed
  - Actual grant activities vary from description in grant agreement



Grantees are required to provide each participant with a satisfaction survey.

### Survey Form

- Postage paid and include self-addressed envelope for direct mailing to SSVF Program Office
- Scantron format: photocopies may be used for distribution

### **Survey Distribution**

- Distribute within 45 to 60 days of participant's entry into SSVF Program
- Distribute again within 30 days of participant's pending exit from SSVF Program



Supportive services grant funds are disbursed via the Department of Health and Human Services' (HHS) Payment Management System (PMS).

- PMS is an internet-based system supported by staff from the HHS Division of Payment Management (DPM).
- Current HHS Payment Financial System account users will use their existing username and password to access the SSVF grant account.
- Current grant funding accounts for existing HHS users will not be affected by the addition of SSVF grant account.



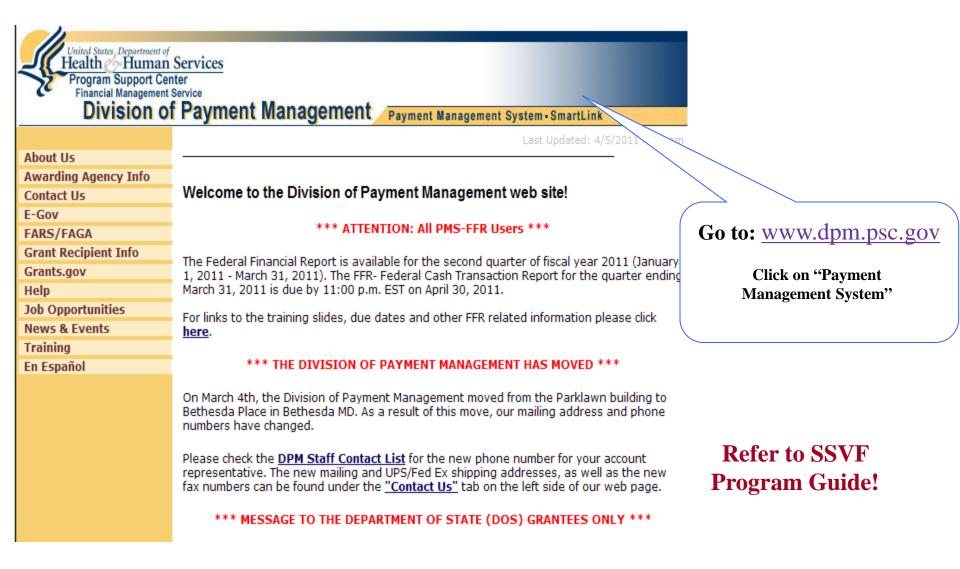
- Grantees are encouraged to make frequent drawdowns, as 100% of funds must be expended by end of grant term
- Per the SSVF Program NOFA, Grantees are subject to the following limitations:

Time Period	Limitation on Cumulative Requests for Grant Funds
During 1st Qtr of Grant Award Period	May not exceed 35% of the total grant award without written approval by VA
End of 2nd Qtr of Grant Award Period	May not exceed 60% of the total grant award without written approval by VA
End of 3rd Qtr of Grant Award Period	May not exceed 80% of the total grant award without written approval by VA
End of 4th Qtr of Grant Award Period	May not exceed 100% of the total grant award



#### **Payment Management System**

Veterans Health Administration





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Internet Access Division of Payment Management Home Page www.dpm.psc.gov

Hours of Operation

Monday through Friday: 5:00 a.m. until 11:00 p.m. EST\* Saturday and Sunday: 9:00 a.m. until 9:00 p.m. EST\*

\*Requests for payment submitted after 5:00 p.m. EST will be processed as if received on the next business day.

**One-DHHS Help Desk** 

Toll Free Telephone Number 1-877-614-5533 E-Mail: PMSSupport@psc.hhs.gov

**On-line Service:** <u>www.psc.gov/one-dhhs</u>

Hours: Monday – Friday 7:00 AM to 9:00 PM EST (except Federal holidays)



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## Audit Guidelines for Supportive Services For Veteran Families Program (SSVF) Grant Recipients



# **SSVF Program Audit**

- VA Financial Services Center (FSC) will provide audit and oversight services for grants awarded by the SSVF that provide housing stability to homeless and at-risk Veterans and their families.
- Throughout the program year, SSVF and FSC will provide updates and information on auditing via monthly informational webinars.



# What to expect...

- Risk Assessment
  - OMB A-133 Single Audit Compliance
  - Prior Year Single Audit Findings
- Fieldwork
  - Unallowable Costs
  - Proper Application of Indirect Cost Rate
- Reporting
  - Management Concurrence / Non-concurrence
  - Exit Conference (By Phone or On-site)
- On-going Quarterly Desk Review of Grantee Payments
  - Reconciliation of Accounting Records, Financial Reports, and Source Documents
  - Transparency and Compliance Recommendations



# Notable Audit Concerns

- Program Compliance
  - Adherence to Grant Agreement and Application
  - Provisional Caps
- OMB Circulars
  - Unallowable Costs
  - Single Audit Requirements
  - Inadequate Internal Controls
  - Indirect Cost Rate Agreement
- Accountability and Transparency
  - Adequate Source Documentation
  - Irreconcilable General Ledger
  - Business Continuity Plan



## **Regulations and Guidance**

• Cost Principles – 2 CFR Part 230 (OMB Circular A-122)

Principles for determining costs of grants, contracts and other agreements with non-profit organizations.

• Audit Requirements – OMB Circular A-133

Non-Federal entities that expend \$500,000 (\$300,000 for fiscal years ending before December 31, 2003) or more in a year in Federal awards shall have a Single Audit or Program-specific Audit conducted for that year.



### **Audit References**

## References

- SSVF Final Rule 38 CFR Part 62 http://edocket.access.gpo.gov/2010/pdf/2010-28407.pdf
- Administrative Requirements –OMB Circular A-110
   <a href="http://www.whitehouse.gov/sites/default/files/omb/assets/omb/circulars/a110/2cfr215-0.pdf">http://www.whitehouse.gov/sites/default/files/omb/assets/omb/circulars/a110/2cfr215-0.pdf</a>
- Cost Principles OMB Circular A-122 <u>http://www.whitehouse.gov/sites/default/files/omb/assets/omb/fedreg/2005/083105\_a122.pdf</u>
- Audit Requirements OMB Circular A-133
   http://www.whitehouse.gov/sites/default/files/omb/assets/a133/a133\_revised\_2007.pdf
   http://www.whitehouse.gov/omb/circulars/a133\_compliance\_supplement\_2011
   http://harvester.census.gov/sac/
- Federal Financial Report SF 425 <u>http://www.whitehouse.gov/sites/default/files/omb/grants/standard\_forms/SF-425\_instructions.pdf</u>
- Generally Accepted Government Auditing Standards (GAGAS)
   <a href="http://www.gao.gov/govaud/iv2011gagas.pdf">http://www.gao.gov/govaud/iv2011gagas.pdf</a>



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## SSVF Grantee Resources are posted on VA's SSVF Website: www.va.gov/homeless/ssvf.asp

Please send any comments and questions to:

SSVF@va.gov