Supportive Services for Veteran Families (SSVF)

SSVF National Webinar Series

SSVF Expanding Services in Response to COVID-19

April 3, 2020

Link to Audio
• Prioritize health and safety of vulnerable Veterans
• Provide support to Veterans currently enrolled in VA homeless programs
• Communicate and coordinate with local VA and other stakeholders
• Changes are happening quickly in response to the COVID-19 crisis; grantees must review program updates
Opportunities for SSVF and GPD Collaboration

Chelsea Watson, Deputy Director, VA Grant and Per Diem Program
• GPD or VA may refer some GPD Veterans to SSVF for EHA
  – Option 1: Veteran exits GPD and transitions to SSVF on path to permanent housing
  – Option 2: Veteran remains in GPD, SSVF provides EHA while GPD provides other supports while co-enrolled

• GPD and SSVF must collaborate to determine best option for the Veteran

• Guidance will change; ongoing SSVF and GPD communication is needed
Opportunities for SSVF and HUD-VASH Collaboration

Jesse Vazzano, National Director
HUD-VASH Program
• Some Public Housing Authorities have reduced services and suspended housing quality inspections; this is delaying Veterans from receiving assistance

• HUD-VASH Veterans have been impacted and can’t move to their identified housing unit without assistance to help with security deposit and rental costs
SSVF EXPANDING SERVICES - RESPONSE TO COVID-19

- SSVF has modified guidance to allow SSVF providers to help HUD-VASH Veterans with TFA Rental Assistance
  - HUD-VASH will continue case management
- New HUD-VASH Referral Packet has been developed
  - SSVF must collaborate with HUD-VASH team to review information sharing, referral process, and prioritization
SSVF Increased Access to Homelessness Prevention and Emergency Housing Assistance

Jill Albanese, Deputy Director
SSVF Program
• SSVF has expanded access to Veterans at risk of homelessness
  – Stage 2 of the HP screening tool is no longer required to provide financial assistance
  – The requirement that a minimum of 60 percent of financial assistance be spent on literally homeless Veteran households has been waived until Sept 30, 2020
  – TFA is not recommended during eviction moratoriums
• Emergency Housing Assistance
  – Determine capacity (funds, staff, hotel partners)
  – Communicate with VA and other stakeholders (capacity, process, prioritization)

• Emergency Housing Assistance tracking and reporting
  – Report all referrals and placements
  – Send to Regional Coordinator weekly
• **Grantees may request additional funds**
  – Grantees are spending into 3rd quarter, spending limit caps will be increased
  – Grantees inform Regional Coordinators if additional funds are needed
  – Submit request through GIFTS

• **Guidance is changing quickly**
  – The SSVF Program Office and RCs will communicate with grantees regarding availability of additional funds
SSVF HMIS Guidance

Cynthia Spencer, Regional Coordinator Supervisor, SSVF
• **HMIS Minimum Requirements**

  – 15 Data elements required by VA

  • Name Data Quality
  • SSN Data Quality
  • DOB Data Quality
  • Race
  • Ethnicity
  • Gender
  • Veteran Status
  • Project Start Date
  • Relationship to HOH
  • Disabling Condition
  • VAMC Station (if HOH)
  • Client Location (CoC Code at the client level)
  • Income Source
  • Project Exit Date (if applicable)
  • Destination (if applicable)
• Local HMIS systems may have additional minimum data standards
  – SSVF providers work with local administrators to determine which local standards and entries are required

• Grantees are expected to complete HMIS files
  – Grantees should work toward obtaining and entering additional missing data elements as soon as possible
• Grantees are expected to complete their monthly Repository upload
  – Files must contain, at least, the 15 minimum data standards
  – Uploads will not be rejected but data quality error alerts may continue until files are updated to contain missing VA data fields
  – The file upload structure, project date, and project descriptors must be correct to complete a successful upload
• HUD has specific guidance regarding uses and disclosures of information to meet minimum standards
  – This information must be in writing and provided to clients
  – If the Privacy Notice provided to clients reflects the minimum standards by HUD, there is no requirement for written or verbal consents
• Disclosures that can happen without client consent includes Public Health Emergencies
• Grantees should follow local written HMIS ROI guidance
• If written standards are too restrictive in the current situation, work locally to address
  – Scale back to HUD’s minimum standards for uses and disclosures
  – Create allowances for verbal consent vs written consent for uses and disclosures
Compliance and Administrative Relief

Jeff Houser, Compliance Officer, SSVF
• On March 9, 2020, OMB issued M-20-11, "Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly impacted by the Novel Coronavirus (COVID-19)," to provide agencies with additional flexibilities for grants assisting the response to COVID-19.

• The memorandum provides short term relief for administrative, financial management, and audit requirements under 2 CFR Part 200, *Uniform Administrative Requirements, Cost principles and Audit Requirements for Federal Awards*, without compromising Federal financial assistance accountability requirements.

• These exceptions are time limited and will be reassessed by OMB within 90 days of this Memo.
• Federal awarding agencies are authorized to take the following actions, **as they deem appropriate and to the extent permitted by law**, with respect to the administrative provisions that apply to recipients grantees affected by the COVID-19.

• **Flexibility with SAM Registration**
  – Awarding agencies can relax the requirement for active System for Award Management (SAM) registration at time of application in order to expeditiously issue funding. At the time of award, the requirements of 2 CFR §200.205, *Federal awarding agency review of risk posed by applicants*, continue to apply. Current registrants in SAM with active registrations expiring before May 16, 2020 will be afforded a one-time extension of 60 days.
• **Flexibility with application deadlines.** *(2 CFR § 200.202)*
  
  - Awarding agencies may provide flexibility with regard to the submission of competing applications in response to specific announcements, as well as unsolicited applications. As appropriate, agencies should list specific guidance on their websites and/or provide a point of contact for an agency program official.

• **No-cost extensions on expiring awards.** *(2 CFR § 200.308)*
  
  - To the extent permitted by law, awarding agencies may extend awards which were active as of March 31, 2020 and scheduled to expire prior or up to December 31, 2020, automatically at no cost for a period of up to twelve (12) months. This will allow time for recipient assessments, the resumption of many individual projects, and a report on program progress and financial status to agency staff. Project-specific financial and performance reports will be due 90 days following the end date of the extension.
• **Allowability of salaries and other project activities.** (2 CFR §200.403, 2 CFR §200.404, 2 CFR §200.405)

  - Awarding agencies may allow recipients to continue to charge salaries and benefits to currently active Federal awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. Awarding agencies may allow other costs to be charged to Federal awards necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. Awarding agencies must require recipients to maintain appropriate records and cost documentation as required by 2 CFR §200.302 *Financial management* and 2 CFR §200.333 *Retention requirement of records* to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services.
• **Allowability of costs not normally charged to awards.** (2 CFR §200.403, 2 CFR § 200.404, 2 CFR § 200.405)
• **Prior Approval Requirement Waivers** *(2 CPR § 200.407)*
  - Awarding agencies are authorized to waive prior approval requirements as necessary to effectively address the response. All costs charged to Federal awards must be consistent with Federal cost policy guidelines and the terms of the award, except where specified in this memorandum.

• **Extension of financial, performance, and other reporting.** *(2 CPR §200.327, 2 CPR § 200.328)*
  - Awarding agencies may allow grantees to delay submission of financial, performance and other reports up to three (3) months beyond the normal due date. If an agency allows such a delay, grantees will continue to draw down Federal funds without the timely submission of these reports. However, these reports must be submitted at the end of the postponed period. In addition, awarding agencies may waive the requirement for recipients to notify the agency of problems, delays or adverse conditions related to COVID-19 on a grant by grant basis *(200 CPR 200.328(d)(l)).*
• **Extension of Closeout** *(2 CPR §200.343)*
  - Awarding agencies may allow the grantee to delay submission of any pending financial, performance and other reports required by the terms of the award for the closeout of expired projects, provided that proper notice about the reporting delay is given by the grantee to the agency.

• **Extension of Single Audit Submission** *(2 CFR §200.512)*
  - Awarding agencies, in their capacity as cognizant or oversight agencies for audit, should allow recipients and subrecipients that have not yet filed their single audits with the Federal Audit Clearinghouse as of the date of the issuance of this memorandum that have fiscal year-ends through June 30, 2020, to delay the completion and submission of the Single Audit reporting package, as required under Subpart F of 2 CFR §200.501 -Audit Requirements, to six (6) months beyond the normal due date. No further action by awarding agencies is required to enact this extension. This extension does not require individual recipients and subrecipients to seek approval for the extension by the cognizant or oversight agency for audit; however, recipients and subrecipients should maintain documentation of the reason for the delayed filing. Recipients and subrecipients taking advantage of this extension would still qualify as a "low-risk auditee" under the criteria of 2 CFR §200.520 (a)-Criteria for a low-risk auditee.
Questions?