

Supportive Services for Veteran Families (SSVF) Program Frequently Asked Questions LAST UPDATED JANUARY 17, 2012

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Budget

Q1. What is the SSVF CFDA number?

A. The CFDA number for SSVF is 64.003.

Q2. What are the requirements for the \$500K audit under the OMB Circular

A. The following is a brief overview of the OMB Circular A-133 single audit requirements. However, Grantees are highly encouraged to thoroughly examine all applicable regulations and directives.

The Single Audit Act Amendments of 1996 establish uniform requirements for audits of Federal awards administered by non-Federal entities. The single audit is intended to meet the basic audit needs of both the non-Federal entity and Federal awarding agencies. It is the combination of the annual financial statement audit and an audit of Federal awards. The single audit is not to be confused with audits conducted by the Federal government. Any additional auditing by the Federal government shall build upon work performed by the independent external auditors.

All non-Federal entities that expend \$500,000 or more of Federal awards in a year are required to obtain an annual single audit or program-specific audit. Non-Federal entities expending less than \$500,000 in a year are exempt from Federal audit requirements for that year, but *must make records available for review or audit* if requested.

In addition to administering Federal awards in compliance with Federal regulations, the non-Federal entities responsibilities in the single audit process are as follows:

- 1. Ensure the proper procurement of external audit services.
- 2. Prepare financial statements and a Schedule of Expenditures of Federal Awards.
- 3. Prepare a Summary Schedule of Prior Audit Findings and corrective action plan if necessary.
- 4. Ensure the timely submission of the audit reporting package and Data Collection Form (form SF-SAC) to the Federal Audit Clearinghouse (FAC).

Resources

OMB Circular A-133:

http://www.whitehouse.gov/sites/default/files/omb/assets/a133/a133 revised 2007.pdf

Federal Audit Clearinghouse FAQ's: http://harvester.census.gov/sac/FAQ.htm#Q1

Q3. When approvals for budget changes are needed?

A. For changes that are less than 10% of total grant award, grantees must request that the Regional Coordinator modifies and provides the revised Quarterly Report, which includes the approved budget. For budget changes that are more than 10% of the total grant award, grantees must submit to the Regional Coordinator, in writing, the request and justification for the significant change. The Regional Coordinator will review the request and submit to the SSVF Program Office. The SSVF Program Office will provide a written response to the grantee indicating approval or denial of the significant change. Approved changes will be reflected in a revised Quarterly Report, which includes the approved budget.

Example 1: Grantee wishes to modify salaries budgeted for personnel and hire additional staff. This modification does not change the grant award amount, but does increase staffing capacity for SSVF program. Grantee will submit this requested change to the Regional Coordinator with a justification regarding the staffing change, who will then make such modifications on the grantee budget and Quarterly Reporting template. This does not require an amendment to the budget or scope of work, since there is less than 10% change to original proposal.

Example 2: Grantee has a total funding award of \$100,000 and wishes to remove \$20,000 from specific line items in the Administration and Program Personnel categories and reallocate these funds to Temporary Financial Assistance, not exceeding the 30% funding cap on this category. The request for budget changes affects more than 10% of the total grant award which indicates a significant change to the original proposal. Grantee will submit this requested change, in writing, to the Regional Coordinator with justification for this significant change, who will then initiate the amendment process with the SSVF Program Office.

Q4. What are the implications of no-cost grant extension until Sept. 30?

A. The SSVF grant agreement term for 2011 is September 15, 2011 – September 30, 2012. However, grantees are not provided additional funding for the extension, which is to be used for completing reporting requirements and preparing for close-out.

Q5. What is the relationship between the VA SSVF Regional Coordinator monitoring visits and the financial auditing performed by the VA Financial Services Center?

A. SSVF Regional Coordinators will conduct an annual monitoring for each grantee. This monitoring consists of an in-depth evaluation of the grantees performance in the following areas: Supportive Services, Program Progress, Participant Eligibility, Overall Management Systems, Subcontractor Management (if applicable), and Financial Management. In the area of Financial Management, Regional Coordinators will assess procedures for financial accounting, internal controls, and recordkeeping in order to assess that grantee expenditures are clearly explained and supported by the approved budget. Grantees may also be selected for a financial audit to be performed by the VA Financial Services Center, which is a review the grantee's allocation of cost to verify that its procedures comply with OMB Circular A87 and OMB Circular A122, made applicable to the SSVF program per 38 CFR 62.

Q6. Can grantees get reimbursement from SSVF for expenses incurred before the contract effective date?

A. The only eligible expense that that could be incurred before the contract date is expenses for the prevention conference attendance if the SSVF grantee budgeted for training costs. All other expenses are ineligible.

Q7. Can grantees utilize an approved indirect cost rate for administrative costs in the SSVF program? What back-up necessary for administrative costs?

A. An indirect rate is not required but the grantees can employ its approved indirect cost rate for allocating administrative cost to the SSVF program if that is part of their organization's financial structure. However, the administrative

costs must be attributed to eligible and allowable activities as established by the Office of Management and Budget (OMB) circular A-122 $^{\rm 1}$ and cannot exceed 10% of the total amount of the Support Service Program, as prescribed in the 38 CFR Part 62.70 $^{\rm 2}$. The SSVF Quarterly reports will require reporting of the lump sum amount of monthly administrative costs.

Furthermore, under the Single Audit Act amendments of 1996 and OMB Circular A-133³, grantees are required to maintain adequate internal controls over managing Federal awards, including maintaining supporting documentation. It is encourage that the grantees take step to develop audit trails of electronic transparencies⁴, as this will expedite the task of regenerating reports when questions, audit reviews or closeout discrepancies arise. Most importantly, the grantees should maintain transparencies to support its methodology for the treatment of administrative costs.

Q8. What back-up necessary for administrative costs?

Grantees should support all administrative costs incurred within the 10% prescribed cap by retaining adequate source documentation which includes the cost allocation policy but not limited to the following source documentation: time distribution records, fringe benefits and withholding associated program employees, rental or lease agreements, utility company bills, all applicable invoices, canceled checks and indirect cost proposal, if applicable.

OMB Circular A- 122: General Principles

² 38 CFR Part 62.70: Financial Management and Administrative Costs

³ Single Audit Act amendments of 1996 and OMB Circular A-133

⁴ Transparencies can consist of all documentation such as ad-hoc reports, time distributions records, emails to support all cost pool calculations or general ledger adjustment entries.

Eligibility

Q9. Can grantees use a Statement of Services (SOS) from a VA medical center to verify Veteran status while I am requesting the DD214 form?

A. Yes a SSVF grantee may use the SOS from a VA medical center as initial documentation of Veteran status. However, the SSVF grantee and Veteran family must continue to pursue the receipt of the DD214 form to document eligible Veteran status.

Q10. Can grantees use the VA Medical card to verify Veteran status while I am requesting the DD214 form?

A. Yes, a SSVF grantee may use the VA Medical care as a proxy from a VA medical center as initial documentation of Veteran status. However, the SSVF grantee and Veteran family must continue to pursue the receipt of the DD214 form to document eligible Veteran status.

Q11. Is the Veteran's household composition self-defined and what verification or documentation needed?

A. A SSVF family household is defined as "All persons who together present for services and identify themselves as being part of the same household." Self- or staff-declarations are acceptable. Proof of family status (i.e. marriage) is not required, but may serve as proof of household status in some circumstances.

Q12. Can HMIS data be used to document family status?

A. No, HMIS data cannot be used to document family status but Self- or staff-declarations are acceptable.

Q13. Are participants from VA Grant and Per Diem (GPD) program eligible for SSVF Rapid Re-Housing?

A. Current GPD participants may qualify for SSVF program services. SSVF grantees must assess the Veteran family's living situation prior to entering the transitional GPD program to determine eligibility. See program guide Determining Housing Status Eligibility.

SSVF services should not replace services to a Veteran family that are already being provided as a part of the GPD program.

*Q14. My 2010 grant proposed to serve Veteran families who were formerly chronically homeless, how far back can the experiences of chronic homelessness by the Veteran family be and what type of documentation is required?

A. To be categorized as formerly chronically homeless the Veteran family's experience of chronic homelessness must have been with three years of the SSVF program entry date. Episodes of homelessness experienced prior to the age of 18 are not included in the determination of formerly chronically homeless.

In addition to documentation proving former chronically homeless status the Veteran family must also meet all other applicable SSVF program requirements before admission. Formerly chronically homeless families may qualify under any of the current Housing Status Categories as determined by their current living situation.

SSVF grantees should follow the documentation standards for places not meant for human habitation and emergency shelter episodes as written in the SSVF program guide. Each SSVF program must make best efforts to gather written documentation provided by an appropriate Third Party that verifies the person's experience of being formerly chronically homeless but self-declaration is also acceptable. Documentation must show the previous homeless experience meets the criteria for chronic homelessness as defined in the Federal Register published 12/17/10, FR Doc 2010-31742.

Please note this is a new FAQ added since the October 20, 2011 Frequently Asked Ouestions

Financial Assistance

Q15. If a Veteran family in the SSVF program separates (divorces, etc.), can you pay rent for two units?

A. Yes, subject to eligibility, time restrictions of designated "Occupying Permanent Household" status, and other financial assistance time restrictions. The time restrictions do not reset for the existing or separated household. The original time restrictions remain in place for households who separate.

If a Veteran becomes absent from a household or dies while other members of the Veteran family are receiving supportive services, then services may continue to the family members for a grace period not to exceed 1 year from the date of absence or death of the Veteran.

Assistance to both households is considered a continuation of services that have been received to date, and not considered to be the start of new services.

When a household currently receiving SSVF assistance splits, the two new households will both be eligible to continue to receive services through SSVF, even if the household with the eligible Veteran no longer continues to be provided SSVF assistance. The grantee will need to continue tracking the original household and enter a new household/program participant into HMIS to track the households separately. Both households must continue to meet SSVF eligibility requirements during each subsequent eligibility recertification.

Q16. If the family receives assistance from another federal, state, or local program for rental assistance (e.g. VASH), can SSVF pay for the tenant portion of the rent if that portion is in arrears?

A. Yes. Rental assistance payments cannot be provided on behalf of participants for the same period of time and for the same cost types that are being provided through another Federal, State, or local housing subsidy program. However, SSVF assistance for rental arrearages is considered a different cost type than assistance for current or ongoing rental assistance, such as that provided by the HUD-VASH program. Since VASH does not provide assistance for tenant rental arrears, SSVF assistance for arrears is an allowable cost in this example. However, SSVF grantees are strongly advised

to include the following conditions support for participants currently in arrears while living in HUD-VASH, or other housing subsidy programs:

- The Veteran should have a fiduciary or representative payee who can insure that over the intermediate term, rent will be paid.
- The fiduciary or representative payee arrangement should continue until the Veteran meets agreed upon targets demonstrating their ability to resume control over their finances.
- A clear plan must be developed by the HUD-VASH case worker (or other staff working with the local subsidy program), working in coordination with the SSVF grantee, that will lead to a path of sustainability for the Veteran in their current housing. This may include money management classes, treatment for SUDs, credit counseling, resolution of outstanding legal issues, and other appropriate interventions.

Q17. If lease is renewed - can the renewal be an "oral agreement"?

A. Each program participant receiving rental assistance must have a written lease for the rental unit, unless the assistance is solely for rental arrears. The program participant must be on the lease. The document must identify the payee (i.e., the individual and/or entity collecting rent), the SSVF program participant as the tenant, and the terms of the agreement (dates of tenancy, monthly amount due, etc.). The agreement must be current, signed by both parties and dated. A verbal/oral agreement is not sufficient for providing ongoing financial assistance.

Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers or canceled checks.

Grantees are encouraged to work with the landlord and program participant to resolve arrears that cannot be documented, using other resources including negotiating a payment plan if possible.

Q18. Can you purchase bus passes to another city (for relocation) if it is part of a housing stability plan

A. This expense is not allowable as a Moving Expense or as Transportation Assistance. Moving costs include expenses such as truck rental, hiring a

moving company or short term storage fees for a maximum of 3 months or until the participant is in permanent housing, whichever is shorter. Allowable transportation assistance pertains to public transportation which intends to mean a local metro or bus system.

Grantees are cautioned when assisting participants to relocate to another city or state to ensure that permanent housing is in fact secured at the new location, and the participant household will be able to sustain permanent housing once there. Participants may have vague plans to stay with friends or relatives in a different city or state, and grantees are responsible for working with the participant to ensure that this is a viable plan. This includes identifying and assisting the participant to resolve any outstanding legal issues that may pose significant barriers to obtaining and maintaining permanent housing in the new location.

Under certain circumstances, such assistance may be allowable. If relocation to a different city or state is part of a participant's Housing Stability Plan, no other resources exist to cover this cost, and the grantee is fairly confident that the plan is viable, assisting with the cost to move may be allowable only as a Purchase of Emergency Supplies. As such, the limitation on amount of financial assistance applies, which is a maximum of \$500.00 per participant during a 3-year period

Q19. When a grantee provides a security deposit/utility deposit back, must they recover the deposit if/when the household moves?

A. VA is giving grantees the discretion to determine how to handle security deposits if and when an assisted household moves from the assisted unit (assuming the landlord has not retained the deposit to pay for damages incurred by the tenant). The grantee may recover the security deposit, in which case it must be treated as program income or the grantee may allow the Veteran family to keep the deposit and use it towards their next unit.

Q20. When a client that has received a SSVF-funded security deposit/utility deposit assistance moves, VA has indicated that the grantee/subcontractor may allow the Veteran family to keep the deposit for use at their next unit, or they may recover the deposit, in which case it must be treated as program income. If the deposits are recovered after the end of the program, how is that money treated?

A. If the deposits are sent back to the grantee or subgrantee after the end of the SSVF grant period, the grantee/subcontractor agency may use the funds as they determine appropriate. There are no Federal requirements governing the disposition of program income earned after the end of the SSVF program. See the related FAQ that describes if and when recovered security deposits become program income.

Q21. If and when do recovered security deposits become program income? If a grantee collects program income after the grant has ended, what should the grantee do with these funds?

A. If the grantee or the subcontractor recovers security deposit monies that originally came from the SSVF grant, the result is the generation of program income. SSVF-generated income received by the grantee is subject to Federal regulations governing program income (there are no SSVF-specific program requirements for program income; the Federal rules apply). Please see 24 CFR part 85.25 for the Federal rules on program income for state and local governments. Likewise, SSVF-generated income received by the subcontractor, which acts on behalf of the grantee, is subject to the same rules governing program income. In both cases, the grantee is responsible for tracking the receipt, use (or re-use), and disposition of all such income. VA does not impose any requirements on program income received after the end of the award period (after the date of the final financial report), and the grantee is free to use that income in any way it chooses

Q22. If utility costs are owed on a former unit, can you pay this in order to be able to have the utilities turned on in the new unit?

A. Yes, if for allowable utility arrears (heat, electricity, water, sewer, and garbage collection) and a reasonable plan to address the participant's ability to make future payments is developed. All other program restrictions regarding time limits and limits on the amount of assistance continue to apply.

Q23. Do you need to liquidate assets (all, some, exclusions, etc) before household can receive temporary financial assistance?

A. No. Grantees are required to include in the calculation of annual income any interest or dividends earned on assets held by the family as part of determining Income Eligibility for SSVF participation. Refer to SSVF Program

Guide, Section VII. C.3(b)(c)(d) for specific guidance.

Q24. Because of the rule that all SSVF participants are reassessed every 90 days, should grantees only plan for services and financial assistance in 3 month increments, even though the participant may qualify and need rental assistance for the up to the maximum five months (within a 12 month time period)?

A. Yes. Recertification must take place before a grantee approves or provides a 4th month of assistance (or 7th, or 10th month, etc). Grantees should begin the recertification process early enough so that they have time to gather needed documentation to confirm continued eligibility without a break in assistance.

Q25.Is it okay for SSVF participants to rent units from the SSVF grantee or its sub-contractors?

A. Yes it is okay to lease rental units to a SSVF family from the agency housing portfolio as long as this represents this is the choice of the SSVF Veteran family and furthermore, this choice is an informed one; that is Veteran families are made aware of other available housing options and have a meaningful opportunity to select them (grantees must offer similar financial supports to rental units not owned by the grantee or its sub-contractors). Residence in grantee or sub-contractor units cannot be required and should not be the only housing placement offer to SSVF Veteran families. These units are subject to the same requirements (i.e. rent reasonableness) as community units if temporary financial assistance funds will be utilized. The use of habitability standards to inspect these units is encouraged.

Q26. What is the maximum amount of financial assistance to a Veteran family?

A. VA has not set a maximum amount of financial assistance per Veteran family. Grantees should assess the family's needs and the effectiveness of providing financial assistance within their approved SSVF budget line item for financial assistance. Please refer to the program guide for details regarding time caps and unit standards pertaining to SSVF financial assistance.

General

Q27. Will abstracts describing projects be published to encourage collaboration among grantees and public awareness?

A. A list of grantees and their contact information will be published shortly. The post-award conference in September will also provide an opportunity for networking and collaboration.

Q28. Will job advertising for the SSVF positions be an allowed expense through the VA?

A. Job advertising for the SSVF positions would be an allowable expense for grantees that included this cost in their application.

Q29. What is needed for the Housing Stability Plan? Is it required for all 3 categories or just category 2?

A. "Occupying Permanent Housing" Category 2 pertains to a very low-income family that is homeless and scheduled to become a resident of permanent housing within 90 days pending the location or development of suitable permanent housing. This is different from a Housing Stability Plan.

An individualized housing stability plan must be developed for all SSVF participants, by the case manager in coordination with the participant. It should be based on strengths and weaknesses identified through the needs assessment. The plan will establish a set of actionable goals intended to address the participant's obstacles to housing stability. Goals should be actionable, timely and reasonable.

As a condition of temporary financial assistance, and as part of the housing stability plan, the grantee must help the participant develop a reasonable plan to address the participant's ability to meet future financial obligations directly related to obtaining and maintaining permanent housing to promote housing stability once SSVF temporary financial assistance ends. See following question for additional clarification.

Q30. Are SSVF grantees expected to help Veteran Families admitted under Category 2 to develop a housing plan?

A. Category 2 admissions must have a plan to move into permanent housing within 90 day prior to acceptance in the program.

SSVF staff will incorporate the anticipated move into permanent housing into the larger housing stability plan.

An individualized housing stability plan should be developed for all SSVF participants, by the case manager in coordination with the participant. It should be based on strengths and weaknesses identified through the needs assessment. The plan will establish a set of actionable goals intended to address the participant's obstacles to housing stability. Goals should be actionable, timely and reasonable

Q31. Is it OK for Veteran families to share housing?

A. Yes, if a shared living situation is part of the Veteran family's housing stability plan.

If two unrelated individuals share a unit and have (or are able to establish) separate lease agreements with the landlord, then the grantee would be able to determine eligibility for and provide assistance to one roommate independently since presumably one person's tenancy and participation in SSVF is not affected by the other.

If two unrelated individuals are joint parties to a lease, a grantee must consider total household income to determine eligibility (i.e., either the whole household is eligible for assistance, or the whole household is not).

Q32. Is the lead based paint assessment required?

A. No, it is not required. Grantees are, however, encouraged to inspect units for habitability using a habitability standards checklist.

Q33. Is an SSVF grantee allowed to change the target population for their local SSVF program?

A. All target population changes should be discussed with the appropriate SSVF Regional Coordinator before implementation. The SSVF Regional Coordinator will determine if a target population change requested requires a

grant amendment.

Q34. Can I use an electronic record keeping system for my participant program information such as intake forms, verification, etc?

A. Yes, as long as the electronic record can be printed upon request. While certain eligibility verification documents must be signed by the appropriate staff, participants, and third parties, a PDF version of those signed documents within an electronic record is considered acceptable.

Q35. Is a Veteran family eligible for the SSVF program if they do not need temporary financial assistance funding?

A. Yes. Each eligible Veteran family receiving SSVF program assistance should receive an individualized service package tailored to their needs. This may or may not include SSVF financial assistance, which is an optional service.

Q36. Are SSVF grantees required to continue to serve household members if a Veteran Family Household separates during their time in the program?

A. SSVF grantee have the option of serving household members for up to 1 year in the case of household separation but it's not required.

Q37. When a case is closed, what follow-up is required?

A. Each SSVF participant should be sent a Satisfaction Survey within 30 days of program exit. Completed surveys should be sent directly to the SSVF Program office in the provided pre-postage paid envelopes.

Q38. The use of Habitability Standards is strongly encouraged, but what are the expectations?

A. Veteran families should be placed in housing of their choice that is habitable, safe and secure. Each grantee should establish a method for documenting unit conditions. The use of habitability standards is strongly encouraged. Please refer to the program guide for sample forms and additional VA guidance

HHS Payment Management System

Q39. In the request for payment, does the "cash on hand" field have to be zero? For example, what if you request funds and have a small balance remaining, but not enough to proceed with operations? Is it okay to list that balance in the "cash on hand field"?

A. When requesting funds through HHS, you need to indicate the balance on hand. In most cases this should be zero, but if there is a small balance on hand, you should indicate that amount in the required field.

Q40. How many users can be registered to the HHS Payment Financial System and how do grantees add users to their account?

A. Grantees can have up to six (6) user accounts. To add users, please complete the HHS Account Access Form (http://www.dpm.psc.gov/grant-recipient/guides-forms/ffr-user-form.aspx) and send to the VA HHS Liaison at anthony.holland@psc.hhs.gov.

Q41. Why do I see three subaccounts listed under the SSVF grant award?

A. The SSVF grant award is broken down by the three major budget categories of each grant: Administration (0001 Adm-11), Coordination and Provision of Supportive Services (0002 SERVICES-11), and Temporary Financial Assistance (0003 TFA-11). Grantees should request payments from the appropriate subaccount.

Q42. Are grantees able to drawdown any remaining balance of SSVF funds at the end of the contract year in order to provide follow-up services?

A. No, all SSVF grant funds must be expended by the end of the contract year. Any remaining funds will be returned to the Department of the Treasury.

Q43. My organization already uses the HHS Payment Financial System. Will the SSVF grant give these users new usernames and passwords?

A. No, existing HHS Payment Financial System account users will use their existing username and password to access the SSVF grant account. However,

these existing users will receive an email from HHS indicating that the SSVF grant award as been added to the organization's account.

Q44. My organization uses the HHS Payment Financial System for other Federal grant programs. Will the SSVF grant award affect the ability to request payments from other grant accounts?

A. No, the SSVF award will be added to the organization's list of available Federal grant programs but will not affect the ability to request payments from these other accounts.

Q45. If grantees mistakenly enter information that results in a calculation error into the Request for Payment information, will the Payment Financial System all users to proceed to the next screen?

A. No, the Payment Financial System will not allow users to proceed with the Request for Payment and will need to go back to the previous screens to correct the error.

Q46. How do grantees make changes to payments or drawdown requests that have been approved?

A. Grantees must contact the VA HHS Liaison at anthony.holland@psc.hhs.gov to request any reversals to previously approved payments. Any corrections made to the SSVF account will appear on the summary page report.

Q47. Are subcontractors held to the same standards as the SSVF grantee, such as the 3-day rule?

A. Subcontractors are held to the same standards as the SSVF grantee regarding compliance with the Final Rule and OMB circulars. Grantees are responsible for the monitoring and oversight of subcontractors, as well as maintaining appropriate financial and program performance documentation.

Q48. Are grantees required to report on an accrual or cash basis?

A. The accounting methodology is established by the grantee. The grantee can record eligible and allowable transactions based on its established accounting method.

Q49. What reports are available in the HHS Payment Financial System for auditing requests and monitoring?

A. The Payment Data Inquiry lists all account transactions for the organization and can be customized by date and specific grant account. This report can be printed and provided to auditors.

Q50. What is the time period / deadline for grantees to submit end of year close out information in for SSVF in the HHS Payment Financial System?

A. SSVF grantees will have 45 days from the end of the agreement term to finalize programmatic and financial close-outs.

Q51. If a grantee changes its financial institution during the grant year, how do they submit this change?

A. If a grantee changes its financial institution, they will need to complete a Direct Deposit Form SF-1199

(http://www.dpm.psc.gov/grant_recipient/new_grantee_information/hhs_11 99a.aspx?) and submit to the VA HHS Liaison (Anthony Holland email), who will make the change to the organization's HHS Financial Payment System account. Grantees must also inform their SSVF Regional Coordinator of this change.

Q52. Is the SF-425 required to be submitted by grantees?

A. No, the SSVF grant funds are categorized in the HHS Financial Payment System as Type B accounts, which do not require grantees to submit the SF-425.

HMIS

Q53. How will the VA be exporting data from HMIS and what data elements will be required?

A. HMIS System Administrators will be responsible for exporting client level data from HMIS and uploading it to the VA Repository monthly in either a CSV or XML format. Detailed instructions, including a recorded webinar and other training materials, on the use of HMIS will be provided to grantees and HMIS staff in the coming weeks.

Q54. Will we be required to use the VA's HMIS system or can we use the current system that we are using for other HUD grants? How will data export from HMIS occur?

A. Grantees should use their local existing HMIS systems for this program – the same system they use for their HUD and other VA funded grants. Detailed instructions, including a recorded webinar and other training materials, on the use of HMIS will be provided to grantees in the coming weeks.

Q55. What SSVF funds are available for HMIS-related costs?

A. The only funds available for HMIS-related costs are those that grantees included in their application budget. No additional funding is available. To the extent grantees need to move funds around in the Administrative Costs section of their budgets in order to accommodate HMIS-related costs, this is acceptable (Note: Administrative costs may not exceed 10 percent of the total supportive services grant). However, per Section 62.60 of the Final Rule, grantees must submit written requests to VA in advance of changes to budget line items that are more than 10 percent of the total supportive services grant award.

Q56. What if the client is receiving benefits from multiple SSVF grantees?

A. Every grantee should make an effort to coordinate SSVF services with other CoC partners to ensure that duplication of services is avoided. However, if a veteran receives services by two separate SSVF grantees, each grantee will need to collect and enter data into HMIS.

Q57. Should Universal Data Element 3.8, Disabling Condition, be updated when the client exits the program?

A. Universal Data Element 3.8, Disabling Condition, is only required to be collected upon program entry or any time *after* the client has been admitted into the program. Per the 2010 HMIS Data Standards, Disabling Condition is not required at program exit.

Q58. Does housing status change with a change in categories?

A. Universal Data Element 3.11, Housing Status, is only required to be collected upon program entry and again at program exit. SSVF grantees should not change Housing Status if a client changes Status of Permanent Housing categories.

Q59. How does Housing Status align to categories? (No data element for categories 1, 2 & 3)

A. Housing Status does not align with the VA's Status of Permanent Housing categories. For purposes of completing the VA required quarterly report, SSVF grantees will need to track VA Categories of Permanent Housing in a separate system.

Q60. When should a participant be entered into HMIS?

A. A veteran household should only be entered into HMIS after an assessment is completed, program eligibility is determined, and SSVF services are provided.

Q61. Will sub-grantees submit exports to the Repository?

A. VA prefers a single data export and upload to the Repository for each grantee. However, the Repository is capable of receiving and coordinating multiple uploads from different service partners or subgrantees associated with a single grantee.

Q62. The cost of exporting data from HMIS to the repository are significant and unanticipated.

A. VA staff assessed all options for SSVF grantees to report program activity. For most grantees monthly exports of client-level detail is the least expensive and most efficient reporting process. Client-level data structures such as CSV (comma separated value) and XML (extensible markup language) are well-documented by HMIS Data Standards and in existence by most HMIS implementations. Grantees that anticipate challenges with the upload process are encouraged to contact their Regional Coordinator to explore technical assistance options.

Q63. What if my program spans multiple COCs & HMIS systems?

A. The official HUD (and VA endorsed) policy is that clients must be entered into the HMIS associated with the physical location of the CoC where the client and services are located. For example, it would not be appropriate for a SSVF subgrantee located in Maine to enter their client data in Massachusetts simply because the primary grantee is located in Massachusetts. We recognize that this policy may create challenges for some SSVF grantees who have contracted with subgrantees throughout a broad regional, maybe even multi-state jurisdiction. The Repository specifications allow for multiple uploads from different HMIS systems but associated with a single grantee for this very reason.

Q64. Does housing status map to the Occupying Permanent Housing categories?

A. Housing Status does not align with the VA's Categories of Permanent Housing. For purposes of completing the VA required quarterly report, SSVF grantees will need to track VA Categories of Permanent Housing in a separate system.

Q65. If we use non-SSVF funds to help vets, do we need to report?

A. No. Grantees are only required to track in HMIS those services proved under the SSVF grant. However, providing a narrative accounting of any leveraged funds can be captured in the quarterly report and may enable grantees to provide useful detail in future grant applications.

Q66. Must grantees enter every client service contact in HMIS?

A. VA requires that only Program Specific Data Element 4.14, Housing Relocation & Stabilization Services Provided, responses be tracked. Services provided are those that the program provides directly for the benefit of program clients.

To minimize staff burden at programs that provide one-time services to clients, the program can enter the start and end dates at the same time or specify software that automatically enters the end date as the day of or the day after the start date for clients receiving on-time services.

Grantees are welcome to track additional services provided but doing so is not required.

Q67. When should data be entered?

A. Data should be entered into HMIS within 24 hours of client contact. Data must be complete and entered into HMIS by the 5th working day of the month following the month of service.

Q68. Where should aggregate Data-HPRP-APR be emailed to?

A. The HPRP APR reports should be submitted to your Regional Coordinator. The HPRP APR reports will no longer be required when data repository is fully functioning.

APR Due Dates

Oct 7= 1st Month (September 15 through September 30)

Nov $7 = 2^{nd}$ Month (October) + YTD

Dec 7 = 3^{rd} Month (November) + YTD

Jan 7 = 3^{rd} Month (December) + YTD

Feb $7 = 3^{rd}$ Month (January) + YTD

Mar $7 = 3^{rd}$ Month (February) + YTD

Q69. What do we do if we have never done APR?

A. Contact your regional coordinator for assistance.

Q70. What portion of HPRP-APR is required to be entered?

A. Only the program portion of HPRP-APR is required. No financial or narrative portions will need to be entered.

Q71. Does the VA require that grantees track client follow-up information (client status post program exit) in HMIS?

A. No. Grantees will not be required to collect client data from households who have exited the program.

Income

Q72. In determining income eligibility – How do you treat assets?

A. When net family assets are \$5,000 or less, use the actual income from assets. When family assets are more than \$5,000, use the greater of actual income from assets or a percentage of the value of such assets based upon the current passbook savings rate as established by HUD. Refer to SSVF Program Guide, Section VII. C.3(b)(c)(d) for specific guidance.

Q73. If a household has sporadic income how does this affect their income eligibility for the SSVF program?

A. Sporadic income is not included in determining income eligibility for the SSVF program. Please refer to the program manual or HUD website for a list of include or excluded income sources.

Q74. If a household has income from self-employment how should this be documented?

A. Income from self-employment can be documented by a review of the previous year's tax return statements or by completion of a Self-Declaration of Income form. It is preferred that whenever possible that third party verification is utilized for all income verifications.

Occupying Permanent Housing Categories

Q75a. If a homeless family receiving assistance through an SSVF program subsequently obtains permanent housing, do they maintain their original "homeless" status for eligibility purposes?

A. Program participants will be classified by category 1, 2, or 3 solely based on their status at program entry. As described under Section VII, Item E, Recertification of Eligibility, a participant's eligibility for continued SSVF services is reviewed according to eligibility criteria, and recertified if the participant continues to meet these criteria.

Please note this is a policy update from the October 20, 2011 Frequently Asked Questions

Q75b. Must a Veteran household's housing status be re-classified from Category 2 or 3 to Category 1 within 30 days of moving into permanent housing?

A. No. Effective January 17, 2012, the reclassification process, previous described under Section VII, Item E, Recertification of Eligibility, Number 2, Housing Status Eligibility, has been eliminated. Program participants will be classified by category 1, 2, or 3 solely based on their status at program entry.

Please note this is a policy update from the October 20, 2011 Frequently Asked Questions.

Q76. What category of occupying permanent housing are incarcerated Veterans considered?

A. For purposes of SSVF, the term "homeless" or "homeless individual" does not include any individual imprisoned or otherwise detained pursuant to an Act of the Congress or a State law. However, there may be cases when a Veteran has permanent housing option and has been incarcerated for 90 day or less. To determine if this Veteran is eligible for SSVF, grantees and subcontractors should assess the Veteran's prior living situation before incarceration. If the Veteran was homeless prior to an incarceration of 90 days or less, they may be eligible under Category 2.

Participant Satisfaction Surveys

Q77. How do we know when a client is actually within 30 days of exit for the survey?

A. In situations where the grantee is actively assisting a participant in transitioning to another location or program, grantees should provide the participant with a satisfaction survey as close to exit as possible. In situations where a participant exits the program unexpectedly, grantees should attempt to follow-up with participant to provide a survey.

Quarterly Reports

Q78. Is there a template form in completing the quarterly report and financial quarterly report?

A. Yes, VA will provide grantees with the template form for completing the Quarterly Report, which include both programmatic and financial sections.

Q79. Is there a minimum variance that grantees are required to report to VA in the quarterly reports? Can there be a guideline that only variances exceeding 10% and/or \$1,000, or another other minimum dollar amount, must be reported?

A. The quarterly report template requests explanations of all variances, positive and negative. The SSVF Program Office, including the Regional Coordinators, will monitor variances and review explanations provided. If an explanation or variance amount is unsatisfactory, you will be notified. Please note that to the extent a grantee wishes to make a change to their budget line items that represents more than 10% of the total grant award amount, a written request must be sent to the SSVF Program Office in advance of making the change per 38 CFR 62.60. The SSVF Program Office will cover this process in greater detail at the post-award conference in September.

Q80. With regard to the required SSVF Quarterly Financial Reports, in what quarter does a grantee report payment requests submitted at the end of a quarter but actually drawn down during the next quarter?

A. Grantees should use the <u>date of the payment request submission</u> to complete the SSVF Quarterly Financial Reports, even if funds are not drawn down until the following quarter.

Q81. With regard to the required SSVF Quarterly Financial Reports, in what quarter does a grantee report expenditures / costs incurred at the end of a quarter but not drawn down until the next quarter?

A. Grantees should use the <u>date of the payment request submission</u> to report expenditures / costs incurred, even if funds are not drawn down until the following quarter.

Q82. In quarterly reports, what is meant by "households with dependents?

A. Households with dependents include households with at least two people where one person is considered a dependent. This person relies on the Veteran family for care and could include children, elderly adults or disabled adult. Example: A Veteran with a dependent can consist of the Veteran and an elderly parent or a Veteran with a child under the age of 18.

Q83. What is the official grant year term for SSVF and what are the quarterly reporting periods for the SSVF grant?

A. The SSVF grant year term is September 15, 2011 – September 30, 2012 and the quarterly reporting periods for the SSVF grant are as follows:

- Quarter 1: September 15 December 31
- Quarter 2: January 1 March 31
- Quarter 3: April 1 June 30
- Quarter 4: July 1 September 30

Renewal Process

Q84. Do you anticipate a second round of SSVF funding? Can you please give us some indication about the expectation for reapplying for the SSVF on a yearly basis? Will we be required to reapply on a yearly basis or will current grantees have priority for the renewal of funds?

A. Subject to the availability of funding, VA expects to issue a NOFA for both new and renewal applicants) in FY 2012. Funding priorities and grant award terms for future NOFAs have not yet been determined. However, there will be a simplified application process for renewal applicants. Please refer to 38 CFR 62.24 for the scoring criteria for renewal applications. Information on this process will be published as soon as it is available.

Trainings

Q85. Are the VA Prevention Conferences in Philadelphia and Los Angeles in August an eligible expense under the SSVF grant? Can any expenses pre-date the MOA date?

A. Attendance at the VA Prevention Conferences in Los Angeles and Philadelphia is <u>not</u> mandatory for SSVF grantees. Travel costs associated with the Prevention Conferences are an allowable use of grant funds. VA will make every effort to execute grant agreements prior to the Prevention Conferences. Please note grantees are responsible for any travel costs incurred prior to execution of the grant agreements. However, VA will permit grantees to later reimburse themselves for the expenses associated with the prevention conference using their grant funds subject to receipt of their executed grant agreement.

Q86. Is there a formal agenda for the VA Prevention Conferences in August?

A. We are finalizing the agenda and it will be sent out to grantees' primary contacts as soon as possible.

Q87. We did not budget for the post award conference in San Diego in September. Is this a direct cost for the grant that will be reimbursed outside of our grant award?

A. Yes, VA will reimburse each grantee for (2) two personnel to attend the Post Award Conference. This will include the hotel costs, travel expenses and per diem for food. This funding is outside of the grant award. More information on the logistics will be forthcoming.