

SUPPORTIVE SERVICES FOR VETERAN FAMILIES PROGRAM

1. SUMMARY OF MAJOR CHANGES: Major changes are as follows:

a. Adds paragraph 7.e. (Operations Oversight) which outlines oversight of grantee operations.

b. Establishes definitions for Audit Recommendation Response and draw-down requests in paragraph 11.

2. RELATED ISSUES: None.

3. POLICY OWNER: The Veterans Health Administration (VHA) Homeless Programs Office (11HPO) is responsible for the content of this directive. Questions may be referred to the Executive Director, VHA Homeless Programs at SSVF@va.gov.

4. RESCISSIONS: VHA Directive 1162.07, Supportive Services for Veteran Families (SSVF) Program, dated January 23, 2018, is rescinded.

5. RECERTIFICATION: This VHA directive is scheduled for recertification on or before the last working day of September 2028. This VHA directive will continue to serve as national VHA policy until it is recertified or rescinded.

6. IMPLEMENTATION SCHEDULE: This directive is effective upon publication.

**BY DIRECTION OF THE OFFICE OF
THE UNDER SECRETARY FOR HEALTH:**

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Assistant Under Secretary for Health
for Clinical Services/CMO

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NOTE: All references herein to Department of Veterans Affairs (VA) and VHA documents incorporate by reference subsequent VA and VHA documents on the same or similar subject matter.

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SUPPORTIVE SERVICES FOR VETERAN FAMILIES PROGRAM

1. POLICY

It is Veterans Health Administration (VHA) policy to provide a fully integrated national system of homeless programming and supportive services to ensure that homeless Veterans and those at risk for homelessness have access to safe, affordable housing, health care and other support that promotes the highest level of independence, self-sufficiency and community integration. This directive establishes VHA Central Office responsibilities concerning the oversight, monitoring and support of the Supportive Services for Veteran Families (SSVF) Program. **AUTHORITY:** 38 U.S.C. § 2044; 38 C.F.R. part 62.

2. RESPONSIBILITIES

a. **Under Secretary for Health.** The Under Secretary for Health is responsible for ensuring overall VHA compliance with this directive.

b. **Assistant Under Secretary for Health for Clinical Services/Chief Medical Officer.** The Assistant Under Secretary for Clinical Services/Chief Medical Officer is responsible for supporting the VHA Homeless Programs Office (HPO) with implementation and oversight of this directive.

c. **Assistant Under Secretary for Health for Patient Care Services/Chief Nursing Officer.** The Assistant Under Secretary for Health for Patient Care Services/Chief Nursing Officer (CNO) is responsible for supporting Patient Care Services program offices with implementation and oversight of this directive.

d. **Assistant Under Secretary for Health for Operations.** The Assistant Under Secretary for Health for Operations is responsible for:

(1) Communicating the contents of this directive to each of the Veterans Integrated Services Networks (VISNs).

(2) Assisting VISN Directors to resolve implementation and compliance challenges in all Department of Veterans Affairs (VA) medical facilities within that VISN.

(3) Providing oversight of VISNs to ensure compliance with this directive and its effectiveness.

e. **Executive Director, VHA Homeless Programs Office.** The Executive Director, VHA HPO is responsible for directing and overseeing the integrated national system of VHA Homeless Programs. This includes, but is not limited to, SSVF Program implementation and delivery across VHA.

f. **National Director, Supportive Services for Veteran Families Program Office.**
NOTE: Through the SSVF Program Office, VHA aims to improve the housing stability of participants, defined in 38 C.F.R. § 62.2 as very low-income Veteran families occupying

permanent housing who are receiving supportive services from a grantee (also referred to as SSVF grantees). Grantees must provide outreach and case management services and must assist participants in obtaining VA benefits and other public benefits that are further defined in 38 C.F.R. §§ 62.33 and 62.34. The National Director, SSVF Program Office is responsible for directing and overseeing the SSVF Program Office and analyzing and evaluating the effectiveness of services provided to homeless Veterans throughout the country. This includes but is not limited to:

(1) Developing both programmatic and fiscal strategic planning documents, reports and information on all initiatives under the SSVF Program Office.

(2) Establishing a training curriculum for SSVF grantees.

(3) Ensuring that eligible Veterans have access to SSVF Program services.

(4) Ensuring there is community integration in the delivery of SSVF Program services. **NOTE:** *SSVF grantees must provide quality care and adhere to Notice of Funding Availability (NOFA) requirements and 38 C.F.R. part 62.*

(5) Developing regulations, notices of funding announcements, application materials and distributing materials for grant opportunities offered under the authority of the SSVF Program Office to the general public.

(6) Awarding supportive services grants to private non-profit organizations and consumer cooperatives in accordance with the threshold, evaluation and selection criteria stated in 38 C.F.R. part 62.

(7) Overseeing and monitoring SSVF grantee processes for reimbursement. The SSVF Program Office must work with the Department of Health and Human Services (HHS) Payment Management System (PMS) to provide funding disbursement oversight; see paragraph 6. **NOTE:** *For more information on PMS, see <https://pms.psc.gov/>.* Funding disbursement oversight responsibilities of the SSVF Program Office include:

(a) Reviewing and approving draw-down requests, as appropriate, that fail to meet the SSVF Program Office's automated reasonable tests.

(b) Contacting grantees whose draw-down requests are not approved.

(c) Responding to electronic inquiries from grantees regarding draw-down requests and approvals.

(d) Requiring that the grantee initiate, develop and submit to VA for approval a Corrective Action Plan (CAP), as needed. See paragraph 7.e.

(8) Evaluating whether grantees are meeting the terms of their grant agreement along with the regulations governing the SSVF Program in 38 C.F.R. part 62 and applicable NOFA. This evaluation includes but is not limited to inspections (see paragraph 5) and a review of performance data collected monthly in the Homeless

Management Information System (HMIS), see paragraph 7.c. Required data elements are identified in the HMIS Data Standards and the VA Data Guide at <https://www.va.gov/homeless/ssvf/hmis/>.

(9) Recommending corrective action, based on the findings of the grantee evaluations described in paragraph 5 and 7; providing notice via email to the grantee of intent to withhold further payment, suspending the supportive services grant or prohibiting the grantee from incurring additional obligations of supportive services grant funds pending corrective action by the grantee or a decision to terminate the grant when a grantee fails to comply with the terms, conditions or standards of the supportive services grant.

(10) Providing subject matter expertise, consultation and training, as needed, and supervision to SSVF Program Office staff.

(11) Maintaining adequate administrative documentation associated with oversight activities. See paragraph 7.e.

(12) Ensuring SSVF Program Office staff comply with the provisions of confidential filer reporting in paragraph 4.

g. Supportive Services for Veteran Families Regional Coordinators. SSVF Regional Coordinators are responsible for:

(1) Providing grantees with support and guidance, based on relevant laws, rules, regulations and analysis of collected data to ensure that appropriate services and case management are provided to Veterans, ensuring SSVF Program accountability.

(2) Monitoring grantees' provision of quality supportive services to ensure compliance with existing laws and regulations. **NOTE:** *Quality supportive services are ensured through regular trainings provided to grantees and consultations to implement and deliver individualized interventions to achieve permanent housing.*

(3) Ensuring grantees are operating in accordance with their supportive services grant agreement and approving significant changes to a grantees' program. See paragraphs 5-7.

(4) Determining grantee effectiveness by reviewing participant satisfaction surveys, and monthly and quarterly data provided by the grantees as well as providing feedback based upon those surveys and data findings to grantees. **NOTE:** *Surveys are distributed electronically to all households enrolled in SSVF services and are reviewed by the SSVF Program Office on a monthly basis. Grantees are required to submit quarterly and annual financial and performance reports to the SSVF Program Office for review, see paragraph 7.c.*

(5) Providing grantees with responses to submission of questions and requests to modify a supportive services grant for any proposed significant change that alters the supportive services grant program and CAPs. See paragraph 7.

(6) Educating community partners that includes VISN and VA medical facility stakeholders about the SSVF Program, SSVF Program eligible Veterans and SSVF Program services and resources, along with the statutes and regulations governing the SSVF Program.

(7) Examining utilization and impact of SSVF Programs on vulnerable Veteran groups using available data (e.g., racial or ethnic, gender, age, geographic location), providing reports to grantees and supporting them in discussions on individual utilization and impact.

(8) Identifying ways to improve the SSVF Program by using data and feedback from grantees to the National Director, SSVF Program Office.

h. **Veterans Integrated Service Network Director.** The VISN Director is responsible for ensuring that all VA medical facilities within the VISN comply with this directive and informing leadership when barriers to compliance are identified.

i. **VA Medical Facility Director.** The VA medical facility Director is responsible for ensuring overall VA medical facility compliance with this directive and appropriate corrective action is taken if non-compliance is identified.

3. ELIGIBLE VETERAN FAMILIES

a. To receive supportive services under this program, a recipient must be a member of a Veteran household, occupy permanent housing and either meet very low or extremely low-income guidelines as defined in 38 C.F.R. §§ 62.2 and 62.11.

b. A very low-income Veteran family is considered to be occupying permanent housing if they fall into one of three categories of occupying permanent housing. For the categories and associated time restrictions, see Part V. Participant Eligibility in the SSVF Program Guide at <https://www.va.gov/homeless/ssvf/ssvf-overview/>.

4. CONFLICTS OF INTEREST

As part of the confidential filer initial and annual reporting, SSVF Program Office employees are required to comply with the provisions of the confidential filer regulation and submit the Office of Government Ethics (OGE) Form 450, Confidential Financial Disclosure Report to the Office of General Counsel, to ensure there is no actual or apparent conflict of interest between the SSVF Regional Coordinator and grantee. See 5 C.F.R. subpart 2634 subpart I. "Confidential Filer" is defined at 5 C.F.R. § 2634.904. OGE Form 450 is located at https://oge.gov/web/oge.nsf/resources_resources-fin-disc.

5. PROGRAM INSPECTIONS

a. **Inspections.** At a minimum, the SSVF Program Office conducts biennial inspections (Financial and Operational Fitness Audits (FOFA)) of grantees' programs. The SSVF Program Office contracts with the VA Office of Business Oversight (OBO) to conduct these standardized reviews. Additional inspections may be conducted if

deemed appropriate by the results of the FOIA. These additional inspections may occur to review the implementation of a grantee's Audit Recommendation Response. Audit Recommendation Responses are triggered when inspections document specific findings that must be remedied by the grantee, see paragraph 7.e. Inspections assist the SSVF Program Office in gathering some of the information necessary to evaluate the grantees' performance. In particular, through inspections, the SSVF Program Office can evaluate whether:

(1) Supportive services provided to participants are within the framework of professional health care delivery standards and operational or clinical authority.

(2) The supportive services grant program is implemented and conducted in accordance with 38 C.F.R. § 62.36 and the supportive services grant agreement.

(3) SSVF grantees' recordkeeping and participant files conform to 38 C.F.R. §§ 62.36 and 62.72, as well as grantees' written policies and procedures that govern their practices.

(4) Grantees' reports to VA are accurate and reflect current program operations.

(5) Participants are satisfied with the supportive services they are receiving from grantees.

b. **Vehicle Lease Funding.** If a grantee receives funding to lease vehicles to provide transportation to participants, the SSVF Program Office must review vehicle usage during annual inspections to ensure activities associated with the vehicle(s) are as designated in the supportive services grant agreement.

6. FUNDING DISBURSEMENT

a. **Overview of the Department of Health and Human Services Payment Management System.** Supportive services grant funds are currently disbursed through HHS PMS. PMS is an internet-based system supported by staff from the HHS Division of Payment Management. Reports provided by PMS to VA aggregate accounting transactions and grantee-provided financial information, facilitating grant management and financial statement reporting.

b. **Fund Disbursement Process.** Grantees may draw down supportive services grant funds in accordance with the timeframes and manner set forth in the NOFA. Draw-down requests are submitted and processed online by the request functions of the PMS platform. Disbursement is completed by electronic funds transfer to the grantee's bank account the following business day. If a draw-down request fails to meet the SSVF Program's automated reasonableness tests (e.g., the request amount exceeds remaining grant funds), the grantee's account is flagged, and funds are disbursed only after an SSVF Program liaison at HHS manually approves the transaction.

7. PROGRAM MONITORING, EVALUATION AND OPERATIONS

a. **Grantee Program Changes.** In accordance with 38 C.F.R. § 62.60, the SSVF Regional Coordinator must approve significant changes to a grantee's program and a grantee must receive VA's approval prior to implementing such changes. Significant changes include, but are not limited to:

(1) A change in the grantee or any subcontractors identified in the supportive services grant agreement.

(2) A change in the area or community served by the grantee.

(3) Additions or deletions of supportive services provided by the grantee.

(4) A change in category of participants to be served.

(5) A change in budget line items that are more than 10% of the total supportive services grant award.

b. **Grantee Program Changes Requests.** Requests for such changes must originate with a grantee and be sent to the SSVF Regional Coordinator for approval or denial. If VA approves such change, VA must issue a written amendment to the grantee's supportive services grant agreement. VA must approve changes only if the grantee's amended application retains a high enough rank to have been competitively selected for funding in the year that the application was granted and that each supportive services grant modification request must contain a description of the revised proposed use of supportive services grant funds.

c. **Grantee Reporting Requirements.** Grantees must enter data into a HMIS web-based software application. This data consists of information on the participants served and the types of supportive services provided by grantees. Grantees must report the data for activities funded by the SSVF Program separate from that of activities funded by other programs. Grantees are required to export client-level data for activities funded by the SSVF Program to VA monthly. Grantees must submit financial and performance reports to the SSVF Program Office for review once per year, or more frequently as requested. Grantees must report on a quarterly basis if actual supportive services grant expenditures vary from the amount disbursed for a given quarter or actual supportive services grant activities vary from the grantee's program description provided in the supportive services grant. The grantee is expected to demonstrate adherence to the grantee's proposed program concept, as described in the grantee's application. ***NOTE: HMIS is a locally administered, electronic data collection system that stores longitudinal personal-level information about persons who access the homeless service system. HMIS is a response to a Congressional Directive to capture better data on homelessness.***

d. **Participant Satisfaction Surveys.** The grantee must provide each participant with a satisfaction survey, which the participant can submit anonymously via email,

phone or electronic system to VA, within 30 days of such participant's pending exit from the grantee's program.

e. **Operations Oversight.**

(1) **Participant Eligibility.** Grantees are expected to provide supportive services to very low-income Veteran families occupying permanent housing. The SSVF Program Office may request documentation from grantees confirming participant eligibility at any time. Grantees are expected to verify participant eligibility at least once every 3 months. Grantees must verify and document each participant's eligibility for supportive services and classify the participant under one of the occupying permanent housing categories (see paragraph 3). Household income is to be calculated by the grantee in accordance with 24 C.F.R. § 5.609.

(2) **Limitations on and Continuations of the Provision of Supportive Services to Certain Participants.** Grantees are expected to adhere to the limitations on and continuations of the provision of supportive services to certain participants described in 38 C.F.R. § 62.35. The SSVF Regional Coordinator may request documentation from grantees demonstrating the grantees' adherence to these requirements at any time.

(3) **Temporary Financial Assistance Payments.** In accordance with any additional requirements or limitations included in a NOFA, grant funds may be used for temporary financial assistance paid directly to a third party on behalf of a participant if the grantee can reasonably determine that the payment would help the participant remain in permanent housing or obtain permanent housing as scheduled. In circumstances where a family member is fleeing domestic violence, these payments can be increased as described in 38 C.F.R. § 62.35. Eligible temporary assistance payments include:

- (a) Childcare assistance.
- (b) Transportation assistance.
- (c) Rental assistance, including the payment of rent, penalties or fees.
- (d) Utility payments.
- (e) Security or utility deposits.
- (f) Moving costs.
- (g) Emergency housing assistance.
- (h) General housing stability assistance.
- (i) Expenses related to employment.
- (j) Broker's fees.

(4) **Allegations of Impropriety.** All allegations of impropriety by the grantee, VA employees or the participants must be addressed immediately and documented through use of the appropriate VA mechanism (e.g., SSVF Program Office, VA OIG, VA Office of Accountability and Whistleblower Protection).

(a) Information about actual or possible violations of criminal laws related to VA programs, operations, VA medical facilities or involving VA employees, where the violation of criminal law occurs on VA premises, must be reported by VA management officials to the VA police component with responsibility for the VA station or VA medical facility in question. If there is no VA police component with jurisdiction over the offense, the information must be reported to Federal, State or local law enforcement officials.

(b) Criminal matters involving felonies must be immediately referred to VA OIG, Office of Investigations. VA management officials with information about possible criminal matters involving felonies must ensure and be responsible for, prompt referrals to OIG. Grantees may be required to notify local law offices or other appropriate State and local agency offices depending on the criminal matter. Examples of felonies include, but are not limited to:

1. Theft of government property over \$1000.
2. False claims.
3. False statements.
4. Drug offenses.
5. Crimes involving information technology systems.
6. Serious crimes against a person (i.e., homicides, armed robbery, rape, sexual assault, aggravated assault and physical abuse of a VA patient).

(5) **Corrective Actions.** In accordance with 38 C.F.R. § 62.60(b), if a grantee's actual supportive services grant expenditures vary from the amount disbursed on a quarterly basis or actual supportive services grant activities vary from the grantee's program description provided in the supportive services grant agreement, the National Director, SSVF Program Office may require that the grantee initiate, develop and submit a CAP to VA for approval. The CAP must identify the expenditure or activity source that caused the deviation, describe the reason(s) for the variance, provide specific proposed corrective action(s) and provide a timetable for accomplishment of the corrective action. After receipt of the CAP, the National Director, SSVF Program Office sends a letter to the grantee indicating that the CAP is approved or disapproved. If disapproved, the SSVF Program Office makes suggestions to improve the proposed CAP and requests a resubmission, or the SSVF Program Office takes other actions in accordance with 38 C.F.R. part 62.

(6) **Withholding and Suspension of Funds.** In accordance with 38 C.F.R. § 62.80(b), when a grantee fails to comply with the terms, conditions or standards of the

supportive services grant, VA may, on 7-day notice to the grantee, withhold further payment, suspend the supportive services grant or prohibit the grantee from incurring additional obligations of supportive services grant funds, pending corrective action by the grantee or a decision to terminate. VA will allow all necessary and proper costs that the grantee could not reasonably avoid during a period of suspension if such costs meet the provisions of the applicable Federal Cost Principles.

(7) **Funding Recovery Process.** VA recovers any supportive services grant funds that are not used in accordance with 38 C.F.R. part 62. The recovery of funds process is as follows:

(a) After the completion of the FOFA, the grantee will receive a report that serves as a pre-determination of any questioned costs that may result in funds due back to VA. The grantee has 2 weeks to respond to each finding and submit an Audit Recommendation Response form. After the closeout of the FOFA it is to be reviewed by OBO and a recommendation given to the SSVF Program Office as to recovery of any possible debt.

(b) After review of all submitted documentation, the National Director, SSVF Program Office, in consultation with the SSVF Program Office Compliance Officer, determines if action should be taken to recover grant funds from the grantee. If there is an outstanding debt, VA issues a notice of intent to recover supportive services grant funds to the grantee. The notice outlines the aspects of the grantee's program that are not in compliance with 38 C.F.R. part 62 and indicates that VA must recover supportive services grant funds.

(c) If the grantee does not believe they owe the debt or think the amount is incorrect, the grantee has a right to dispute the debt. The grantee has 30 days upon receipt of the notice to contact the Debt Management Center to dispute the debt or agree to a payment plan.

(8) **Supportive Services Grant Termination.** A supportive services grant may be terminated in whole or in part in accordance with 38 C.F.R. § 62.80(c) if any of the following three conditions applies:

(a) By VA, if a grantee materially fails to comply with the terms and conditions of a supportive services grant award and 38 C.F.R. part 62;

(b) By VA with the consent of the grantee, in which case VA and the grantee agree upon the termination conditions, including the effective date and, in the case of partial termination, the portion to be terminated; or

(c) By a grantee upon sending to VA written notification setting forth the reasons for such termination, the effective date and, in the case of partial termination, the portion to be terminated. However, if VA determines in the case of partial termination that the reduced or modified portion of the supportive services grant will not accomplish the purposes for which the supportive services grant was made, VA may terminate the supportive services grant in its entirety as mentioned above.

(9) **De-obligation of Funds.** VA may de-obligate all or a portion of the amounts approved for use by a grantee, in accordance with 38 C.F.R. § 62.80(d), if:

(a) The activity for which funding was approved is not provided in accordance with the approved application and the requirements of 38 C.F.R. part 62;

(b) Such amounts have not been expended within a 1-year period from the date of the signing of the supportive services grant agreement; or

(c) Other circumstances set forth in the supportive services grant agreement authorize or require de-obligation.

(10) **Administrative Files.** The National Director, SSVF Program Office must maintain adequate administrative documentation (e.g., a copy of the supportive services grant application and agreement, financial and performance reports) associated with oversight activities. **NOTE:** *Critical incidents, grantee webinars and grievances are documentation types kept on a shared drive accessible to SSVF Program Office staff and not in the administrative files.*

8. TRAINING

There are no formal training requirements associated with this directive.

9. RECORDS MANAGEMENT

All records regardless of format (e.g., paper, electronic, electronic systems) created by this directive must be managed as required by the National Archives and Records Administration (NARA) approved records schedules found in VHA Records Control Schedule 10-1. Questions regarding any aspect of records management should be addressed to the appropriate Records Officer.

10. BACKGROUND

a. The SSVF Program provides supportive services to very low-income Veteran families who are in or transitioning to, permanent housing. Funds are granted to private non-profit organizations and consumer cooperatives that assist very low-income Veteran families by providing a range of supportive services designed to promote housing stability. The SSVF Program is an integral part of the VA's continuum of homeless services, offering both rapid re-housing for homeless Veteran families and prevention services for those at imminent at risk of homelessness. **NOTE:** *Rapid re-housing rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance.*

b. The SSVF Program is a community-driven program that relies on providers (grantees). The unique structure of the SSVF Program requires careful coordination among grantees, community providers, Continuums of Care (a regional or local community-based planning body that coordinates housing and services funding for homeless families and individuals), VHA Homeless Programs and other VA and VHA

services and departments in order to ensure SSVF services are delivered to serve homeless Veterans. The SSVF Program Office communicates with the Executive Director, VHA HPO; VHA Homeless Program leads; Network Homeless Coordinators; and VHA Homeless Programs staff on monthly and quarterly calls. These calls provide SSVF Program nationwide updates related to best practices towards ending Veteran homelessness, situational awareness of current efforts, community partnerships and operational improvement, performance outcomes, community coordination and planning. VHA staff at the VA medical facility, VISN and national levels can access program performance data on VHA Homeless Programs Operational Planning Hub at <https://r03cleapp06.r03.med.va.gov/hub2/hp/initiatives.html>. **NOTE:** This is an internal VA website that is not available to the public.

11. DEFINITIONS

a. **Audit Recommendation Response.** An Audit Recommendation Response is a form completed by the grantee in response to the results and findings of the FOFA. The grantee provides a CAP and a planned completion date for resolving the identified issues.

b. **Draw-Down Request.** A draw-down request is a transfer of grant funds, initiated by the grantee, from the grantor to pay grant-related expenses.

12. REFERENCES

a. 38 U.S.C. § 2044.

b. 5 C.F.R. subpart 2634 subpart I.

c. 38 C.F.R. part 62.

d. 24 C.F.R. § 5.609.

e. Homeless Management Information System and Data Reporting. <https://www.va.gov/homeless/ssvf/hmis/>.

f. Supportive Services for Veteran Families Overview. <https://www.va.gov/homeless/ssvf/ssvf-overview/>.

g. Veterans Health Administration Homeless Programs Hub. <https://r03cleapp06.r03.med.va.gov/hub2/hp/initiatives.html>. **NOTE:** This is an internal VA website that is not available to the public.

h. Program Support Center. Payment Management System. <https://pms.psc.gov/>.

i. Confidential Financial Disclosure Report (OGE Form 450). https://oge.gov/web/oge.nsf/resources_resources-fin-disc.