

# **VA Grant & Per Diem**

**Fiscal Year 2022**

**Case Management Renewals**

**Grant Recipient Guide**

**VA**



U.S. Department  
of Veterans Affairs

**Table of Contents**

VA Grant & Per Diem (GPD) National Program Office..... iii

    Contact Information..... iii

    GPD Program Staff..... iii

    GPD Web Resources ..... iii

Overview ..... 4

Expectations and Operational Framework ..... 4

    Electronic Grants Management..... 4

    Financial Management ..... 4

    Regulations..... 4

Understanding the Case Management Grant ..... 5

    Funding Uses..... 5

    Case Management Services..... 6

    Incentives..... 6

Understanding Roles and Responsibilities..... 7

    Grantee Roles..... 7

    Liaison Roles ..... 7

    Quarterly Webinars..... 8

Grant Administration & Oversight ..... 9

    Administrative File..... 9

    Case File..... 9

    Data & Reporting..... 10

    Quarterly Reviews & Monitoring..... 10

    Case File Review ..... 11

    Veteran Interviews..... 11

    Extensions ..... 12

    Billing..... 12

    Financial Reporting..... 13

    Eligibility..... 14

    Veterans with Multiple Case Management Program Entries..... 15

Requesting Corrective Action ..... 16

    Corrective Action Plan ..... 16

    Payment Withhold/Suspension ..... 16

    Changes Related to the Grant ..... 16

Special Circumstances..... 18  
    Suicide Prevention ..... 18  
    Special Reporting Circumstances ..... 18  
    Allegations of Impropriety ..... 18  
VHA Partnerships & Community Coordination ..... 19  
    HUD-VASH GPD Collaborative Case Management..... 19  
    GPD/HCHV ..... 19  
    SSVF ..... 19  
    HUD-VASH ..... 20

# VA Grant & Per Diem (GPD) National Program Office

## **Contact Information**

General Operational Questions: [GPDGrants@va.gov](mailto:GPDGrants@va.gov)

Fiscal Questions: [GPDFiscal@va.gov](mailto:GPDFiscal@va.gov)

GPD Vouchers: [GPDVouchers@va.gov](mailto:GPDVouchers@va.gov)

## **GPD Program Staff**

Jeffery Quarles, Director

Chelsea Watson, Deputy Director

Elizabeth Whittington, Program Analyst

Janine Griggs, Clinical Program Specialist

Erin Johnson, Clinical Program Specialist

Yvette Green, Auditor

Coral Baker, Financial Management Specialist

Sharon Wilkerson, Administrative Officer

## **GPD Web Resources**

GPD National Site: <https://www.va.gov/HOMELESS/GPD.asp>

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

## Overview

Welcome to Fiscal Year 2022! GPD is a true partnership between VA and community providers across the country. The GPD National Program Office applauds the collaborations that GPD grantees and VA teams cultivate together to build robust service delivery networks for the Nation's most vulnerable Veterans. Thank you for the valuable work you do every day to help end Veteran homelessness.

In general, this guide was developed to give grantees and VA staff an overview of GPD Case Management (CM). The FY 2022 CM awards are renewals, meaning that they are continuation of CM grants with Federal Award Identification Numbers (FAINs) ending in CM-20, and only grantees with FY 2020 CM awards could apply for the FY 2022 renewals. However, FY 2022 CM grants are new awards and have new FAINs ending in CM-22.

The information in this guide is to be used for reference and general guidance. It does not supersede any national GPD regulations, other statutes, or governing laws. GPD grantees are required to be aware of and comply with any federal, state, or local laws. Links to the GPD regulations—as well as other relevant regulatory and statutory guidance—may be accessed at on our [GPD public-facing websites](#).

## Expectations and Operational Framework

### Electronic Grants Management

In FY 2022, the GPD National Program Office is using SmartSimple for electronic grant submissions and ongoing grant management. It is critically important that grantee staff have access to SmartSimple, and the grantee's agency contacts are up to date. Vital information from the GPD National Program Office will be relayed to grantees through the SmartSimple system. Grantees will only be able to properly interface with SmartSimple if their points of contact are entered correctly and maintained as staffing changes. It is the grantee's responsibility to maintain current and accurate contacts in SmartSimple. The GPD National Program Office expects to introduce more features in SmartSimple throughout FY 2022. Information and training about the SmartSimple system is available on the GPD Provider website.

### Financial Management

Please review the [Financial Reporting](#) section of this guide. FY 2022 Case Management grants are renewals; **however, a final SF 425 is required within 120 days after September 30, 2021 for previous Case Management grant award (FAIN ending CM-20).**

### Regulations

- Grantees and liaisons must have a thorough understanding of all federal regulations applicable to GPD
- 38 CFR 61 sets forth GPD-specific regulations
  - Be sure to review § 61.90 *Grant for case management services - program*
- Links to the current regulations are available on the GPD website
- eCFR link: <https://ecfr.federalregister.gov/current/title-38/chapter-I/part-61>

## Understanding the Case Management Grant

The GPD Case Management (CM) grant provides grant funding for time-limited case management services. The goal is to improve the retention of housing by Veterans who were previously homeless and are transitioning to permanent housing from programs such as GPD or VA's Healthcare for Homeless Veterans (HCHV) Contracted Residential Services (CRS) Program.

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

### Funding Uses

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

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

There is a six-month time limit for Veterans to receive case management services. However, the local VA Medical Center (VAMC) may approve a request to extend services beyond the six-month period if a grantee submits a request to the liaison in writing and the liaison approves it before the six-month time limit expires.

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

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

## **Case Management Services**

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

- Home visits to monitor housing stability
- Providing/coordinating educational activities
- Meal planning
- Tenant responsibilities
- Use of public transportation
- Referrals to needed services, such as mental health, substance use disorder, medical and employment services
- Financial management
- Development of natural supports
- Participation in case conferencing with other service providers who are working with the Veteran

## **Incentives**

Effective June 8, 2021, GPD allows Case Management grantees to provide incentives to Veterans they serve. Incentives may assist with engagement, increase retention in the CM program, and/or aid Veterans. Total incentives may not exceed \$150 per Veteran. A few points:

- The max of \$150 per Veteran is part of the grantee's draw down from their total CM award
  - Grantees must budget the cost of incentives within their existing award
  - No additional funds will be awarded
  - The \$150/Veteran could spread out over the time in the CM grant, or spent all at one time
- Incentives may be made available to a Veteran after 30 days of participation in the GPD Case Management program
- The grantee must track expenses with itemized accounting, documentation, and receipts
- The grantee must retain receipts
- The incentives are only for allowable expenses
  - Transportation (bus and rail passes, gas)
  - Furniture or household item(s)
  - Groceries
  - Clothing
- Incentives may not be cash, but they may have cash value
- Gift cards are not allowed
- Purchases must be made by the grantee and the items provided to the Veteran

A sample incentives expenses tracking spreadsheet is available on the GPD Provider webpage.

## Understanding Roles and Responsibilities

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

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

### Grantee Roles

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

Please note that if there are multiple grantee staff members involved with one grant, it is imperative that there is an effective system of communication in place. This is necessary to ensure knowledge by all involved staff members of current grant status, issues, successes, and next steps. It also is important to convey these systems and processes to the GPD liaison. It is expected that the grantee navigates VA systems independently. However, if assistance is needed, grantees should ask the liaison for guidance, as appropriate.

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

### Liaison Roles

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

It is expected that the liaison reads and understands the GPD regulations, the CM grant regulations, the grant application, and any subsequently approved changes of scope.

The monitoring role of the liaison is less intensive than with the GPD transitional housing grants. HOMES entries and exits are not required and there is no annual inspection that involves coordination of an inspection team. **However**, there is a HOMES entry component for [HUD-VASH GPD Collaborative Case Management](#) and the GPD liaison should ensure it is completed by the VA HUD-VASH point of contact.



CM GPD Liaison duties include:

- Receive and review the monthly GPD Case Management Caseload Tracking Tool
- Conduct quarterly reviews and address concerns as they arise
- Follow up with critical incidents/sentinel events
- Provide consultation and guidance to the grantee on VA systems navigation and information
- Initiate corrective action when relevant
- Provide approvals/disapprovals for extensions
- Maintain an administrative file

The liaison is not typically expected to meet with Veterans other than for [quarterly review Veteran interviews](#). An exception to this may occur in the case of a sentinel event. As clinically indicated, when the grantee reports a sentinel event to the liaison, the liaison should outreach to the Veteran to ensure that assessment of risk and appropriate referrals for services occurs. The liaison may offer to help by offering referrals for services, care coordination, or crisis intervention. As appropriate, the liaison should coordinate with the grantee.

### **Quarterly Webinars**

Grantees must check the GPD provider website monthly for current guidance and policies. The GPD provider website is: [https://www.va.gov/HOMELESS/GPD\\_ProviderWebsite.asp](https://www.va.gov/HOMELESS/GPD_ProviderWebsite.asp). Grantees and liaisons should also attend quarterly GPD CM webinars and technical assistance trainings

- **For GPD grantees:** Quarterly CM grantee webinars are scheduled on first Thursdays of every three months, beginning November 4, 2021 at 2pm Eastern
  - A calendar invitation with the meeting information will be sent to the designated GPD grantee's point of contact
  - The GPD National Program Office expects a representative from the grantee's agency to attend
- **For VA staff:** Quarterly CM webinars internal to VA employees are scheduled on the third Thursdays every three months, beginning November 18, 2021, at 2pm Eastern
  - Please ask the GPD National Program Office for a calendar invitation
  - The GPD National Program Office expects VA GPD liaisons working with CM grantees to attend
  - NHCs and other VA Homeless Programs staff are welcome to attend

## **Grant Administration & Oversight**

### **Administrative File**

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

The below must be maintained in the grantee's administrative file:

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

Liaisons almost must maintain and administrative file. The administrative file can be either paper or electronic, depending on the preference of the local VAMC. The file must be accessible by all VAMC Homeless Programs staff.

The below must be maintained by the liaison in the administrative file:

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

### **Case File**

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

The below must be maintained in the case file:

- Veteran information, including at minimum:
  - Verification of eligibility status (e.g., SQUARES report, DD214)
  - Family status
  - Employment history

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

### **Data & Reporting**

The grantees are responsible for maintaining data around caseloads. Grantees will provide data to the liaison monthly using the *GPD CM Caseload Tracking Tool*. The *GPD CM Caseload Tracking Tool* and the *GPD CM Caseload Tracking Tool Data Dictionary* are available on the GPD provider site:

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

### **Quarterly Reviews & Monitoring**

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

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

Reviews are to be completed by the end of January, April, July, and October. GPD liaisons will provide a copy of the quarterly review and the grantee should add it to the grant administrative file. Grantees are reminded of their responsibility to protect Veterans' privacy. The *GPD CM Quarterly Review Form* can be found on the GPD provider site: [https://www.va.gov/HOMELESS/GPD\\_ProviderWebsite.asp](https://www.va.gov/HOMELESS/GPD_ProviderWebsite.asp).

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

The quarterly review will include the following:

- 1) Conversation with the grantee and documentation review to evaluate:
  - Grant compliance
  - GPD regulation adherence
- 2) Case file review to evaluate:

- Proof of eligibility is present
- Extension waivers are present
- The quality of services provided
- Optimal documentation standards
- Grant compliance
- A match with information on the *GPD CM Caseload Tracking Tool*

3) Interviews with Veterans to evaluate:

- Level of program satisfaction
- Accuracy of information reported by the grantee
- Any concerns that may require corrective action
- Grant compliance

When the quarterly review is complete, the liaison and supervisor sign the GPD CM Quarterly Review Form and store it in the administrative file, along with the completed GPD CM Veteran Questionnaire. The document does not need to be forwarded to the National Homeless Coordinator (NHC) or the GPD National Program Office; but please be aware that audits may be conducted. A copy is shared with the grantee, not to include any liaison notes from the Veteran interviews which include Veteran identifiers and responses.

### **Case File Review**

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

### **Veteran Interviews**

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

Liaisons must document deficiencies, needs for corrective action, challenges and successes are documented. Corrective action requests must follow the corrective action protocol outlined. When the quarterly review is complete, the grantee will receive a copy of the report from the liaison and will store it in the administrative file.

*For liaisons:* The Veteran interview includes completing the GPD CM Veteran Questionnaire. The liaison will select five Veterans to interview for each grantee case manager from the ten files reviewed. Veteran interviews may be conducted over the phone or in person, keeping Veteran preference in mind. Use the GPD CM Sample Veteran Interview Questions as a pool of questions to guide conversations with the Veteran. Keep notes from the interviews to complete the GPD CM Quarterly Review Form. Protect the anonymity of the Veteran by preserving these notes for a VA-only record. A summary of concerns about services, challenges and success of the program that were revealed from the interviews will be documented on the GPD CM Quarterly Review Form.

## **Extensions**

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

Considerations for Extensions:

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

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

## **Billing**

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

*NOTE: Anticipated in April 2022, the federal government will move away from DUNS/EIN to a Unique Entity Identifier (UEI) that will be generated by the System for Award Management (SAM). No action is needed by grantees. More information can be found on [www.SAM.gov](http://www.SAM.gov) and on [www.GSA.gov](http://www.GSA.gov).*

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

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

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

The instructions for adding banking information, can be found at the following URL:

## **Financial Reporting**

When communicating with the GPD National Program Office, or with anyone at VA, it is essential that all correspondence includes the grant's FAIN.

The FAIN is broken into six parts which uniquely identify GPD grants. Below is an example FAIN to better understand the numbering convention.

| <b>Example FAIN: ABCD222-0999-544-CM-22</b> |                       |                          |                              |                              |
|---|-----------------------|--------------------------|------------------------------|------------------------------|
| <b>Unique Agency Identifier</b>             | <b>Project Number</b> | <b>VA Station Number</b> | <b>Grant Type (Per Diem)</b> | <b>Year of Initial Award</b> |
| ABCD222                                     | 0999                  | 544                      | CM                           | 22                           |

Case Management FAINs will now end in CM-22 to reflect the grant renewals. CM-20 grants must complete a Final FFR as indicated below.

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

Grantees must submit a financial requirement to GPD on a quarterly basis in January, April, July, and October.

- Quarterly requirements are due no later than 30 days after the end of each fiscal year quarter (*i.e.*, no later than 30 day after September 30th, December 31st, March 31st, and June 30th).
- Fiscal reporting is based on the federal fiscal year; October 1 to September 30
  - All grantees are required to complete the FFR SF 425 on an annual basis for each FAIN
  - Annual FFRs are due no later than 90 days after the end of the federal FY (September 30)
    - Grantees email SF 425s to [GPD425@va.gov](mailto:GPD425@va.gov)
  - If the GPD grantee withdraws from the grant or is terminated, a final FFR will be due
    - The final FFR is due no later than 120 days after the date of withdrawal or termination
    - If the grantee's agency has overages, DO NOT include a check with the FFR
    - If the FFR indicates funding is due to be returned, our office will initiate a formal Notice of Indebtedness with instructions on how and where to send payment or request waivers of debt
- It is very important that if no one in the grantee's agency has expertise in meeting federal grant compliance requirements, professional grant management services are retained.

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

All financial reports must be accurate. Supporting documentation must be maintained and made available for VA review upon request. Grantees are encouraged to monitor their requests for funding closely. It is the

grantee's responsibility to initiate timely communication with the liaison, with GPD and/or with the Payment Management System representatives about questions or problems.

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

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

### **Eligibility**

Generally within GPD, "Veteran" means anyone discharged or released from active service—regardless of length of service—excluding anyone who received a dishonorable discharge or was discharged through a general court-martial. A bad conduct discharge can result from a general court-martial or a special court-martial. **Anyone with a bad conduct discharge from a general court-martial is ineligible; anyone with a bad conduct discharge from a special court-martial is eligible.** The length of service restrictions under 38 U.S.C. 5303A do not apply.

The GPD grantee must verify Veteran eligibility for the GPD Program by asking the GPD liaison to check eligibility and/or by utilizing [SQUARES](#).

Accessing SQUARES requires permission and a greater level of review. Community users must verify their identity. Community organizations serving Veterans will need to apply for SQUARES access. Each organization must designate a SQUARES manager. The SQUARES manager is responsible for reviewing and approving user access within the grantee's organization. If a grantee is having trouble verifying a Veteran's GPD eligibility, the grantee's staff may ask the Veteran for her/his records. If there are questions about SQUARES, please refer to this website: <https://www.va.gov/homeless/squares/>. Additionally grantees may contact [SQUARESAdmin@va.gov](mailto:SQUARESAdmin@va.gov) for technical assistance.

If using SQUARES, grantees are expected to keep a copy of the eligibility confirmation from SQUARES in the Veteran's case file. The grantee must make eligibility information and the Veteran case file available to the liaison during the quarterly review, annual inspection, or upon request.

Although grantees may use SQUARES to determine preliminary eligibility, they should also help Veterans obtain copies of their DD-214s and retain copies in individual case files. NOTE: Grantees need to double-check eligibility information for Veterans determined ineligible through SQUARES. SQUARES may contain false negatives. For example, SQUARES cannot identify Special Court Martials. Grantees will have to evaluate negative results from SQUARES on a case-by-case basis.

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

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

There are no regulations limiting episodes of care pertaining to the GPD CM grant. A Veteran is allowed to enter the GPD Case Management program multiple times if needed. It is advised that grantees assess the reasons for the need for another program entry before readmitting the Veteran. There may be another program that may better suit the Veteran.

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

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



## Requesting Corrective Action

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

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

### **Corrective Action Plan**

The process of corrective action is detailed extensively in [VHA Directive 1162.01 Grant and Per Diem Program](#). Liaisons should follow this process when working with grantees. However, corrective action involves due process, and grantees and liaisons should work closely and proactively to resolve any issues requiring correction before a formal process is needed.

A CAP is a formal letter signed by the VAMC director outlining the deficiency that is not meeting grant requirements, inspection standards, or other issues related to the environment of care and/or Veteran safety. The CAP will clearly state the deficiency or deficiencies and allow the grantee time—typically 30 days—to perform remediation.

Grantees should not be surprised by nor be unaware of an impending CAP letter. The liaison should clearly discuss any findings at once upon discovery and provide the grantee the opportunity for correction. Quarterly reviews lend themselves to discussion of any grant compliance or performance issues. Grantees should include their leadership in the discussions.

Progressive sanctions, e.g. suspension of per diem payments, termination of the grant, are possible. Please refer to VHA Directive 1162.01 Grant and Per Diem Program for a full description of consequences of failure to remediate issues noted in CAP letters.

When a CAP is considered successfully remediated, the VAMC director will sign another letter noting the issue is resolved.

### **Payment Withhold/Suspension**

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

### **Changes Related to the Grant**

Any significant alteration in an awarded grant requires a change of scope which must be approved in writing by the GPD National Program Office before it can be implemented. Proposed reductions in service are not acceptable rationale for a change in scope. Please note, the GPD National Program Office will also consider whether the grant application would have scored as well in the year it was funded if the proposed change of scope is approved.

Changes of scope must be submitted to the GPD National Program Office (through [GPDGrants@va.gov](mailto:GPDGrants@va.gov)) by the grantee with the liaison's approval, or by the liaison and/or NHC directly. Changes of scope should be discussed with the GPD liaison and the VAMC prior to submission to the GPD National Program Office.

Examples of modifications that require a change of scope request:

- Changes in services provided
- Changes in staffing (including credentialing or educational requirements)
- Changes in admission or discharge criteria
- Changes in population served

## Special Circumstances

### **Suicide Prevention**

Suicide prevention is an urgent priority and suicide safety plans are expected to be in place among all grant recipients. At each VAMC, there is a [suicide prevention program](#) and a designated Suicide Prevention Coordinator. Each grantee should have a suicide prevention plan in place to assist Veterans in crisis. VA GPD liaisons can help provide the necessary VAMC contacts and information. The Veterans Crisis Line can also provide immediate assistance by calling **1-800-273-8255**. Additionally, the Veterans Crisis Line offers online chat and text options. Please visit <https://www.veteranscrisisline.net/> for more information and options for hard-of-hearing Veterans.

### **Special Reporting Circumstances**

Sentinel or critical events may occur and require additional reporting actions to the VA GPD liaison. Some examples include Veteran injury, overdose, death, or damage to the grantee's facility where Veterans reside. Grantees should have an internal incident reporting system and must ensure that these incident reports are provided to the GPD liaison within 24 hours. If liaisons are not being informed by the grantee of critical issues affecting Veterans or the grantee's facilities, the liaison may conduct unannounced visits and/or request a written communication plan.

### **Allegations of Impropriety**

All allegations of impropriety will be immediately addressed and documented through use of the appropriate VA mechanism, (e.g., VA Patient Representative, Quality Management, Board of Inquiry, Office of the Inspector General). This is paramount for the health and safety of the Veterans served. As a condition of the grant award, grantees must cooperate with these inquiries.

## VHA Partnerships & Community Coordination

### **HUD-VASH GPD Collaborative Case Management**

Housing and Urban Development – Veterans Affairs Supportive Housing HUD-VASH and VA Grant and Per Diem (GPD) Collaborative Case Management (CCM) enhances and expedites HUD-VASH voucher utilization by partnering with existing GPD case management services. Within the HUD-VASH GPD CCM model, GPD grantees with an existing Case Management grant provide case management services to HUD-VASH-eligible Veterans to assist them in obtaining and sustaining permanent supportive housing.

Veterans served by this collaboration must be eligible to receive services through a GPD Case Management grant and must meet all HUD-VASH eligibility requirements. Veterans appropriate for HUD-VASH GPD CCM have lower clinical acuity than those traditionally served by HUD-VASH (i.e., a less intensive need for case management); however, they should still have a need for permanent supportive housing and case management services. Unlike in typical GPD Case Management, Veterans already in permanent housing are not eligible for this collaboration because they would not be eligible for HUD-VASH. This CCM project allows for homeless Veterans eligible for HUD-VASH to take part in the GPD Case Management grant.

In HUD-VASH GPD CCM, much of the pre-housing work normally performed by VA HUD-VASH staff will shift to GPD Case Management grantees. GPD grantees will coordinate with their local VA Medical Center points of contact to ensure referrals. Grantee case managers may assist Veterans with housing searches, obtaining housing placements, utilizing a HUD-VASH voucher, and will provide ongoing case management services for up to six months after permanent housing placement. After six months, the GPD CCM case manager will transfer Veterans to the local VA HUD-VASH team for ongoing case management services.

To participate in HUD-VASH GPD CCM, the GPD grantee must submit a Change of Scope (COS) to the GPD Program Office. HUD-VASH GPD CCM represents request to serve a population normally not served by Case Management grantees; this is why a COS is needed. Grantees should follow regular COS practices and work through the COS process with their assigned GPD liaison(s). The COS must additionally include an application checklist and a Memorandum of Understanding (both provided by the GPD office) between the GPD grantee and the local VAMC. The GPD Program Office will review and approve all HUD-VASH GPD CCM proposals and will communicate such proposals to the HUD-VASH Program Office.

GPD Case Management grantees interested in learning more about or applying to participate in GPD CCM may contact VA's GPD Program Office ([GPDGrants@va.gov](mailto:GPDGrants@va.gov)).

### **GPD/HCHV**

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

### **SSVF**

Veterans in the Case Management Program may apply to utilize temporary financial assistance (TFA) from the SSVF program. The application packet must be used by GPD grantees providing transitional housing with the support of the GPD Liaison when seeking one-time TFA for literally homeless Veteran households who would

remain homeless "but for" SSVF assistance. GPD grantees should be strategic in identifying only Veterans who are most in need of this service such as Veterans with zero income, Veterans who are quickly being placed into housing without time to save, and Veterans with limited resources or supports. This is important because SSVF will not be able to serve every Veteran entering permanent housing. Additionally, funding is based on the SSVF grantee's discretion and is subject to availability.

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

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

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

### **HUD-VASH**

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