

Stand Down Application Review and Post-Event Reporting Submission Guide

VPL 01-23 Attachment #1



United State Department of Labor
Veterans' Employment and Training Service

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I. The Purpose of this Guide

To establish procedures for interested parties on how to apply for Stand Down (SD) funding, the process for submitting required post-event reports, and to ensure compliance with Veterans' Program Letter (VPL) 01-23 and applicable laws, regulations, and policies.

II. Eligibility

The following entities may apply for SD grant funding: State and Local Workforce Development Boards, Veteran Service Organizations, local public agencies, tribal governments, and non-profit organizations including community and faith-based organizations. **Note:** Organizations registered with the Internal Revenue Service as 501(c)(4) entities are ineligible to apply for this funding opportunity.

III. Grantee Transmittal Memorandum

Applicants must provide a Transmittal Memorandum (TM) signed by an individual authorized to enter into an agreement with the U.S. Department of Labor (USDOL or DOL). The same individual must sign the SF-424, Application for Federal Assistance. The TM should verify the anticipated dates of the SD, the amount requested for the SD event, and other relevant information regarding the planned event.

IV. Program Narrative

SD applicants must submit a Program Narrative (PN) providing Veterans' Employment and Training Services (VETS) with key information justifying the need for the award. SD applicants must tailor the anticipated services to the needs of veterans experiencing homelessness in their community.

The PN should provide an itemized list of services and **must include the five required services** outlined below:

- A. Health screenings/examinations.
- B. Housing/shelter referral.
- C. Mental health services.
- D. DOL employment and job training assistance.
 1. Applicants should coordinate with their local American Job Center (AJC) for employment and training services.
 2. Services can be provided by AJC employment specialist(s), ideally a Disabled Veteran Outreach Program (DVOP) specialist when available, to actively participate and provide employment services at the SD event.
- E. Veterans benefit counseling, ideally provided by the U.S. Department of Veterans Affairs.

In addition to these five required services, the PN must also contain clear and concise descriptions of the following areas:

- A. The need for the event by outlining:

1. The importance of the event based on current local circumstances.
2. A description of the geographic area to be served.
3. The most recent data for sheltered and unsheltered homeless veterans referenced from a local, state, or national source.
4. The expected number of homeless male and female veterans the event anticipates serving.
5. The expected number of non-veteran and/or non-homeless participants the event anticipates serving. **Note:** VETS SD funding may only be used for eligible participants. If non-homeless and/or non-veterans attended the event, then a cost share calculation must be applied.

B. The services and activities are planned for the event by outlining a description of goods and services to be provided to veterans experiencing homelessness, in addition to the AJC services described in section V.A.2 above, that take place during the SD event. **Note:** Activities planned but not provided must be addressed during the after-action reporting process.

C. How the applicant will provide accountability and tracking by outlining:

1. Participant registration, homelessness verification, goods and services provided, food consumed, and cost distribution of allowable items.
2. How the SD event will enhance employment and training opportunities, or promote the self-sufficiency, of veterans experiencing homelessness.

V. **Standard Form 424 (SF-424), Application for Federal Assistance**

In order to receive a federal award, all SD applicants must complete a [SF-424](#). The SF-424 must be signed by an authorized representative who assumes responsibility to ensure proper implementation of the SD award. Refer to the checklist attached to this Guide, for more details when completing the SF-424.

VI. **Standard Form 424A (SF-424A), Budget Information for Non-Construction Programs**

All SD applicants must complete a [SF-424A](#). Applicants must provide narrative justification, and cost methodology, to support the content of the SF-424A within the Budget Narrative (BN). The SF-424A provides general budget information that must add up to the total amount applied for in the SF-424 and must crosswalk with the BN.

VII. **Budget Narrative (use whole dollar amounts)**

The BN must clearly provide a description of costs associated, and cost methodology, with each cost category on the SF-424A. Per [2 C.F.R. § 200.403](#), factors affecting allowability of costs, except where otherwise authorized by statute, must meet the following general criteria in order to be allowable under federal awards. They must be:

- A. Necessary for the performance of the award.
- B. Reasonable.
- C. Allocable.

SD costs are considered necessary when the expenditure would enhance participants' opportunities securing employment and training, promoting the self-sufficiency of veterans experiencing homelessness, and benefits as many veterans as feasible. Examples of typical SD expenditures are:

- A. Purchase of hygiene supplies (toothbrushes, toothpaste, soap, combs, mouthwash, etc.).
- B. Purchase of clothing (underwear, socks, coats, boots, shoes, trousers, etc.).
- C. Purchase of outdoor gear for individual use (backpacks, tents, sleeping bags).
- D. Rental of transportation (bus, van, car, taxi, etc.).
- E. Rental of tents or canopies, folding tables and chairs, generators, and portable toilets.
- F. Transportation vouchers (bus passes) or gift cards for food or gasoline. **Note:** Gift cards for food and/or gasoline must be restricted to cards that can only be used to purchase these items. Budgets that include gift cards must describe measures taken to ensure gift cards are compliant with SD policy.
- G. Advertisement.
- H. Security personnel.
- I. Non-prescription reading glasses.
- J. Food items.
- K. Cups, plates, trash bags.
- L. COVID supplies.

SD funding is provided to support the planned event only. Durable goods such as generators, tents, canopies, tables, chairs, or other items that might be retained by the grantee and used for other events are not to be purchased but should be rented.

SD applicants anticipating participants other than veterans experiencing or at-risk of homelessness **must include a fair share calculation** applicable to expenditures shared among homeless veteran participants and non-homeless veteran participants. DOL SD funds may **only** be used for homeless veterans and veterans at risk of homelessness. Below is an example reflecting the *concept* of fair-share calculations:

Item	Full Cost	40% Anticipated Veterans Experiencing or At risk of Homelessness	60% Anticipated Other Participants
Security	\$1,000	\$400	\$600
Tents	\$2,000	\$800	\$1,200
Chairs	\$500	\$200	\$300
Food	\$2,200	\$880	\$1,320
Sleeping Bags	\$600	\$240	\$360
Generators	\$1,000	\$400	\$600
Backpacks	\$500	\$200	\$300
Hygiene Kits	\$300	\$120	\$160
Portable toilets	\$1,000	\$400	\$600
Winter coats	\$1,500	\$600	\$900
Total	\$10,600	\$4,240	\$6,360
Total Requested from SD Applicant:		VETS SD Funds: \$4,240	

Note: If a SD event will exclusively serve veterans experiencing homelessness or those veterans at risk, no cost-sharing is necessary. Applicants must clearly demonstrate how they will screen participants to ensure only these veterans have access to the event.

Title [2 C.F.R. § 200.404](#) provides the following regarding **reasonable costs**: A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. Advertising costs **must not** exceed 20 percent. When determining if a planned expenditure is reasonable – refer to the following below:

- A. The cost is a type generally recognized as ordinary and necessary for the operation and efficient performance of the federal award.
- B. The requirements imposed by factors such as: sound business practices; laws and regulations; and terms and conditions of the federal award.
- C. Market prices for comparable goods or services for the geographic area.
- D. Individuals concerned acted with prudence in the circumstances considering their responsibilities to the non-federal entity. The non-federal entity significantly deviates from its established practices and policies regarding the incurrence of costs.
- E. Stand Down expenditures should benefit as many homeless veterans as possible. Expenditures that benefit only one or a few homeless veterans are considered unreasonable.

Title [2 C.F.R. § 200.405](#) provides the following regarding **allocable costs**: A cost is allocable to a particular federal award, or other cost objective, if the goods or services involved are chargeable or assignable to that federal award or cost objective in accordance with relative benefits received. Some costs are not allowed by federal regulation and, therefore, cannot be chargeable or assigned to the SD award. For additional information refer to [2 C.F.R. § 200.421](#) *et seq.* for a description of the allowability of certain costs. Examples of **unallowable** costs include, but are not limited to:

- A. Healthcare expenditures.
- B. Housing expenditures.
- C. Pocket knives or other weapons.
- D. T-shirts, hats, or other clothing items for volunteers, pen sets, military and veteran type patches/medals, memento gifts for staff members, visitors, or volunteers.
- E. Food for volunteers

If you have a question regarding the allowability of costs, please consult with the DVET.

VETS reviews proposed expenditures based upon the above criteria and may, at its discretion under [2 C.F.R. § 200.458](#), grant written approval allowing certain expenditures prior to the SD event. According to 2 C.F.R. § 200.458, pre-award (or pre-event) costs are those incurred prior to the effective date of the federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent they would have been allowable if incurred after the date of the federal award, and **only with the written approval** of the federal awarding agency. If pre-event costs are anticipated, please ensure this is clearly articulated in the SD application. Note that financial obligations against SD funds are not allowed after period of performance (PoP) ends.

In circumstances of a major disaster or federal emergency declaration, VETS may accept applications up to \$50,000 to conduct SD events in those impacted areas. DVETs must provide technical assistance to ensure compliance with VPL 01-23. There may be expenditures unique to natural disasters. To ensure compliance with allowable expenditures, per [2 C.F.R. § 200.403](#) and to avoid potential delays, DVETs must provide technical assistance prior to submitting the SD application, for continued departmental review.

VIII. System for Award Management (SAM) Confirmation

All SD applicants must have an active SAM registration in order to receive federal funding. The SAM registration must be current and not expire before or during the proposed SD PoP date(s). Verification of an entity's SAM may be conducted by visiting the United States Federal Contractor Registration's [website](#).

IX. Letter(s) of Support

All SD applicants are highly encouraged to submit a letter of support from the AJC that will support the SD event. Other letters of support from community resources are encouraged.

X. Application Submission

Once all required documents have been completed and the application is ready for submission, the application should be emailed to the DVET within the state the SD event is planned no later than 90 days prior to the event date. Applicants are strongly encouraged to share their draft applications with the DVET in an editable format (i.e., Microsoft Word) prior to submitting a final application.

XI. Application Review

Grantees should anticipate a thorough review and analysis of SD applications. Once the DVET completes their review, they will either contact the applicant to provide any necessary technical assistance, or finalize the submission and send it forward for continued processing. Please be advised additional amendments may be needed depending on any continued findings as processing continues.

XII. Agency Contacts

Questions regarding SD grants and applications should be sent to the DVET within the state a SD event is planned. Contact information for your respective DVET can be found on the DOL/VETS [website](#).

XIII. Grant Award

The authorizing official identified in the application will receive the Notice of Award. Grantees must follow all aspects of the award’s terms and conditions. Questions regarding the award should be directed to the DVET.

XIV. Stand Down After-Action Report

Grantees must submit a VETS-703, [Stand Down After-Action Report \(SDAAR\)](#) to the GOTR no later than 30 days after the end of the quarter during which the SD was held.

Quarter during which the SD was held	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sep
Report due to DVET NLT	Jan 31	Apr 30	July 31	Oct 31

The DVET should verify the following:

- A. Compare services provided at the event to the planned services in the application. If anticipated services/activities were not provided as planned, the grantee must provide an explanation on the SDAAR outlining what prevented those services/activities from being provided. Advise the grantee that depending on the circumstances, funding allocated for any planned services not conducted may be deemed unallowable.
- B. Was the date and location of the SD event entered?
- C. Did the grantee indicate the number of male and female veterans experiencing homelessness that attended the event?
- D. Is the certifying official’s contact information and signature present?

XV. Final FFR and Grant Closeout

The Final Standard Form (SF) 425 financial report is due no later than 120 days after the PoP ends and must be submitted in the Payment Management System (PMS).

DOL will contact the authorized representative and the point of contact identified on the applicant's SF-424 within 15 days prior to the end of the PoP with instructions for submitting the remainder of the closeout package.

Grantees must complete all closeout requirements ensuring totals on all documents and reports are accurate and that a signature is provided where requested.

DVETs must review and certify an analysis of the grantee's reported expenditures per [2 C.F.R. § 200.344](#). This certification confirms:

- A. The grantee did not exceed the cost limitation requirement.
- B. Costs were expended in accordance with VETS approved budget.
- C. The grantee complied with the terms and conditions of the award.

Liquidation: Per [2 C.F.R. § 200.344](#) "Closeout" (b), "Unless the Federal awarding agency or pass-through entity authorizes an extension, a non-Federal entity must liquidate all obligations incurred under the Federal award not later than 120 calendar days after the end date of the PoP as specified in the terms and conditions of the Federal award."

Therefore, unless the DOL VETS Grant Officer has granted an extension, Grantees must liquidate all obligated funds within the 120-day liquidation period (also known as "closeout" period). Per [2 C.F.R. § 2900.15](#), "the only liquidation that can occur during closeout is the liquidation of accrued expenditures for goods and/or services received during the grant period." **No new obligations can be made after the PoP.**

If a grantee must return funds, either through inadvertent overdraws or costs deemed unallowable by the DOL, refer to the U.S Department of Health and Human Services Payment Management System (HHS-PMS) Program Support Center website on [returning funds](#) for instructions. The grantee's verification of payment must accompany the financial report.

Grant closeout training is available through the [National Veterans' Training Institute \(NVTI\)](#). Grantees should expect DVETs to conduct a review of a grantee's reported expenditures and will provide technical assistance as needed.

The Office of Grants Management (OGM) will proceed with closeout once the certification is completed and forwarded. For questions regarding closeout process, contact the VETS Office of National Programs, Office of Grants and Training at hvrp@dol.gov.

XVI. Additional Resources

The following resources may assist you with your application and award oversight:

- A. The National Veterans' Technical Assistance Center ([NVTAC](#)).
- B. National Veterans' Training Institute ([NVTI](#)) [SD Training](#).

- C. [Homeless Court: Taking the Court To Stand Down](#), a Collaborative Effort to Assist Homeless Veterans, Strengthen Communities and Maximize Court Resources. Prepared by the American Bar Association Commission on Homelessness and Poverty and the National Coalition for Homeless Veterans.
- D. [U.S. Interagency Council on Homelessness \(USICH\), Housing Solutions Information](#)
- E. [U.S. Department of Housing and Urban Development \(HUD\) Continuum of Care Program information](#): The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, state, and local governments to quickly rehouse homeless individuals and families. For additional information regarding CoCs, please contact [NVTAC](#).
- F. [U.S. Department of Housing and Urban Development-VA Supportive Housing \(HUD-VASH\) Program](#)
- G. U.S. Department of Veterans Affairs programs, including:
 - 1. [U.S. Department of Veterans Affairs Homeless Veterans - Grant and Per Diem Program: Provider Website](#)
 - 2. [U.S. Department of Veterans Affairs Homeless Veterans - Veterans Justice Outreach Program](#): The goal of the Veterans Justice Outreach (VJO) program is to avoid the unnecessary criminalization of mental illness and extended incarceration among Veterans by ensuring that eligible, justice-involved veterans have timely access to Veterans Health Administration (VHA) services, as clinically indicated. VJO specialists provide direct outreach, assessment, and case management for justice-involved Veterans in local courts and jails and liaison with local justice system partners.
 - 3. [Supportive Services for Veteran Families \(SSVF\)](#) housing services
 - 4. [Veteran Readiness and Employment \(VR&E\)](#)
 - 5. [Homeless Veteran Community Employment Services \(HVCES\)](#).