



**VETERANS' PROGRAM LETTER NO. 04-24**

TO: ALL VETERANS' EMPLOYMENT AND TRAINING  
SERVICE (VETS) HOMELESS VETERANS'  
REINTEGRATION PROGRAM GRANT RECIPIENTS  
ALL VETS STAFF

FROM: JAMES D. RODRIGUEZ, MA  
Assistant Secretary

SUBJECT: Homeless Veterans' Reintegration Program Award Amendments

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**I. Purpose**

This Veterans' Program Letter (VPL) provides guidance on the submission of grant award amendments for VETS' Homeless Veterans' Reintegration Program (HVRP) grant recipients.

**II. References**

- A. 38 United States Code (U.S.C.) Chapter 20, as amended, specifically:
  - 1. 38 U.S.C. § [2021](#), Homeless Veterans' Reintegration Programs
  - 2. 38 U.S.C. § [2021A](#), Homeless Women Veterans and Homeless Veterans with Children reintegration grant program
  - 3. 38 U.S.C. § [2023](#), Referral and Counseling Services: Veterans at Risk of Homelessness who are Transitioning from Certain Institutions
- B. [2 Code of Federal Regulations \(C.F.R.\) Part 200 Subpart D](#), Post Federal Award Requirements
- C. [2 C.F.R. Part 2900](#), DOL-Specific Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- D. Terms and Conditions attached to each HVRP grant award

**III. Rescissions**

- A. VPL 05-19, Exception for the Provision of Emergency Services by Homeless Veterans' Reintegration Program Grantees Outside of their Approved Service Delivery Area;

- B. VPL 06-18 Change 1, Grant Modification Process for Grants Awarded Under the Homeless Veterans' Reintegration Program;
- C. VPL 06-18, Grant Modification Process for Grants Awarded Under the Homeless Veterans' Reintegration Program;
- D. VPL 03-18, Grant Modification Requests Due to Unanticipated Circumstances Resulting in Poor Performance; and
- E. Grant Officer's Memorandum (GO Memo) 01-17, Updated Information Regarding the Negotiated Indirect Cost Rate (NICRA), Modified Guidance Regarding Grant Modifications, and SF-425.

#### **IV. Background**

This guidance is for grant recipients requesting to amend their grant award. HVRP grant recipients must request and obtain prior written approval for certain grant award changes. If prior written approval is required, grant recipients cannot implement changes until they have received an approved amendment issued by the Grant Officer through VETS' grants management system, [GrantSolutions](#) (GS).

#### **V. Amending Federal Grant Awards**

Certain changes to the initial grant award may require submittal of an amendment application in GS for approval by the Grant Officer. The Grant Officer may also identify requested changes to the grant award that may require submittal of an amendment request. The categories of amendments for HVRP grants that may require an amendment application are outlined below. For specific grant forms and documentation required for each amendment type, please refer to Attachment A: HVRP Award Amendments Technical Assistance Guide (TAG) or the most recent policy guidance on the subject.

##### **Categories of Amendments for HVRP:**

- **Incremental Funding Amendments:** HVRP grants are funded incrementally throughout the period of performance (PoP). Grant recipients entering program year (PY) two or three of their PoP are eligible for Incremental Funding (IF), subject to the availability of funds, program authority, satisfactory performance, and compliance with the terms and conditions of the federal award. HVRP recipients will receive a GO Memo containing the details for submitting an IF amendment application. Please refer to the VETS [Policy Guidance](#) webpage for the most recent guidance on IF amendments.
- **General Amendments:** After the initial award, the grant recipient may request to amend their grant award during the PoP by submitting an amendment application in GS. As outlined in this section, certain changes during the PoP that impact the budget and/or the Statement of Work (SOW) and agreed-upon outcomes or deliverables require prior approval and submittal of an amendment application by the grant recipient. Grant recipients should consult with their Grant Officer's Technical

Representative (GOTR) if they have any questions pertaining to specific types of amendment requests. While discussions between the grant recipient and the GOTR are an integral part of the amendment application process, they do not replace an amendment application. The GOTR must review the amendment applications, and the Grant Officer must approve the request using an executed award amendment process in GS.

General amendments include the following:

- A. Statement of Work changes:
  - i. Changes to a grant recipient's planned goals due to unanticipated circumstances. The criteria for unanticipated circumstances are outlined in Section I.A. of the HVRP Award Amendments TAG
  - ii. Changes to the Period of Performance (see Attachment A, Section I.A.2.):
    - 1. Extension under [2 C.F.R. § 200.308\(e\)\(2\)](#)
    - 2. Self-Termination under [2 C.F.R. § 200.340\(a\)\(4\)](#)
  - iii. Changes to the outcomes or deliverables as described in the project's approved narrative, and/or Service Delivery Areas (adding, removing, modifying).
- B. Administrative changes (see Attachment A, Section I.B.):
  - i. Changes in key personnel
  - ii. Address change & organization/institution name change
- C. Budget Realignment (see Attachment A, Section I.C.):
  - i. Transfer of 10 percent or more of funds among direct cost categories
  - ii. Transfer of funds budgeted for participant support costs to other categories of expense
- D. Purchase of equipment with a unit cost of \$5,000 or more (See Attachment A, Section D.)

- **Conditions of Award:** Grant recipients may be required to respond to Conditions of Award (COA) identified in a previously issued amendment. The amendment citing the COA assigns a condition number to each issue and includes condition-specific instructions on how to resolve the issue(s), which may require the submission of an amendment application. Grant recipients must respond to the conditions as instructed within the specified timeframe, or the Grant Officer may exercise the legal remedies under [2 C.F.R. § 200.339](#).

## VI. Changes Not Requiring an Amendment

- A. **Change to a Negotiated Indirect Cost Rate Agreement (NICRA), Cost Allocation Plan (CAP), or Election to Utilize the 10 percent De Minimis Rate:** Grant recipients must notify their GOTR when the documents have been submitted to the Federal Cognizant Agency for approval. Once the proposal is approved, the grant recipient must upload a copy of the NICRA/CAP via a grant note in GS. If the newly approved indirect cost rate is expected to result in moving more than 10 percent of the total grant award between cost categories, the grant recipient must also submit a

budget realignment amendment application in accordance with Section V of this VPL.

If the grant recipient elects to utilize the de minimis rate, the grant recipient must not have a current negotiated rate (including provisional rate) and must provide notice via a grant note in GS that includes their calculation of 10 percent of Modified Total Direct Costs (MTDC). [2 CFR 200.1](#) defines MTDC as all direct salaries and wages, applicable fringe benefits, materials and supplies, services, and travel up to the first \$25,000 of each subaward or subcontract (regardless of the PoP of the subawards and subcontracts under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs, and the portion of each subaward or subcontract in excess of \$25,000. See the Terms and Conditions of your grant agreement for more on the election and use of the de minimis rate.

- B. **Budget Changes:** In accordance with [2 C.F.R. § 200.308](#), no prior approval is needed for cost-related changes, including re-budgeting of funds or deviating purchases from the budget narrative, unless the change results in meeting one of the items listed in Section V above that requires an amendment application. If a grant recipient determines a need to expend funds that are not listed within their most recently approved budget narrative, the grant recipient must consult with their GOTR for technical assistance. Although an amendment application, or prior approval, is not required for transfers less than 10 percent among direct cost categories, grant recipients must notify the GOTR of the transfer for tracking purposes. The grant recipient is responsible for ensuring that all expenditures, including those identified in the most recently approved budget narrative, are necessary, reasonable, allocable, and allowable in accordance with [2 C.F.R. § 200.403](#) before charging any expense. VETS encourages grant recipients to make reasonable efforts to leverage other resources prior to incurring costs, if applicable.
- C. **Personnel Line Changes:** Changes to HVRP staff, position, or percent of time charged to HVRP do not require an amendment application unless the change results in a transfer of 10 percent or more among direct cost categories or a change to the SOW. The grant recipient must consult with their GOTR regarding these changes and note them in the Technical Performance Narrative submitted during quarterly performance reporting.

## VII. Actions Required

- A. Grant recipients should consult with their assigned GOTR for assistance in preparing a grant amendment application.
- B. Incremental Funding amendment applications are due in accordance with the applicable GO Memo or most current guidance on the topic.
- C. General amendment applications for budget realignment must be submitted to the GOTR, in accordance with the HVRP Award Amendments TAG, via GS, at least 30

days prior to the grant recipient's proposed effective date for the requested action.

- D. If the amendment application is in response to a COA, the amendment must be submitted in GS by the due date identified by the Grant Officer in the COA.
- E. The GOTR reviews the amendment application for compliance, completeness, and accuracy and provides technical assistance to the grant recipient if any revisions are needed for the amendment to meet the requirements of this guidance. If the request is not compliant, complete, or accurate, the GOTR documents the deficiencies in an application note and returns the amendment application to the grant recipient within GS and enters the reason for return in the required comments section. The grant recipient makes the required changes and resubmits the amendment request.
- F. Once the GOTR finds the amendment acceptable, the GOTR generates an application note in GS confirming that their review is complete. The VETS Regional Office (RO) reviews the amendment request for compliance, completeness, and accuracy.
- G. The RO reviews the amendment application notes generated by the GOTR. In the event a revision is required, the RO notifies the GOTR and enters the reason for return in the required comments section. The GOTR provides technical assistance to the grant recipient until the amendment application meets the requirements within this guidance. Once the GOTR confirms all required revisions to the amendment were made, the GOTR notifies the RO that the amendment application is ready for their review. Once the RO confirms the amendment application is ready to be processed by the Office of National Programs' Office of Grants and Training (G&T), the RO generates an application note in GS confirming that their review is complete, selects verify completion of the amendment application within GS, and then sends a notification to [HVRP@dol.gov](mailto:HVRP@dol.gov) to notify G&T that the amendment application is complete and ready for review.

## **VIII. Inquiries**

Questions regarding this policy must be directed to the grant recipient's assigned GOTR.

## **IX. Expiration Date**

This VPL will be reviewed for relevance on or before December 2026. It shall remain in effect until rescinded or superseded.

## **X. Attachments**

Attachment A: HVRP Award Amendments TAG