

**U.S. Department of Labor**  
**Veterans' Employment and Training Service**  
**Homeless Veterans' Reintegration Program (HVRP)**  
*COVID-19 Questions and Answers for Grantee Staff*

**1. Do HVRP programs have to submit quarterly reports?**

Grantees are required to submit performance and financial reports within 30 days after the end of the quarter. Grantees that are unable to submit timely reports as a result of the COVID-19 pandemic must request an extension through their Grant Officer Technical Representative (GOTR). The request must be submitted to the GOTR via email before the report due date; please include the specific reason the extension is needed and the estimated date by which they will be able to submit the report.

**2. What happens if an HVRP grantee cannot expend all funding for Program Year 2019?**

Except for grantees currently in their second and final option year, the Program Year (PY) 2019 period of performance, to include funding, will be extended in the PY 2020 grant award, until June 30, 2021. The Notice of Obligation will be available through the award process. VETS is currently developing guidance for financial and performance reporting.

**3. Does an HVRP grantee have to continue program operations, including outreach, if a state imposes social distancing restrictions, for example, limiting groups to no larger than 10 at one time?**

Grantees should follow the Centers for Disease Control (CDC) and state and local government guidance in making determinations related to whether and how staff should conduct outreach and other grant operations, and should consider the environment in which the work is being conducted and the risk of virus transmission. Many activities may be impacted and VETS provides flexibility to grantees in how they provide services. Grantees can choose the best method of continuing to deliver program services. The security of participant data and its transmission as well as ease of participant access must be considered.

**4. Will HVRP grantees be held accountable for performance measures and should grantees request a modification to adjust their targets?**

VETS is monitoring service disruptions that may affect performance, including how long these disruptions last. We will provide guidance for competitive performance measures and corrective action plan requirements. Grantees should keep their GOTR informed and document the impact on performance.

**5. How should grantees document barriers/issues to performance?**

Communication with your GOTR is key. In addition to written (email) communication with the GOTR, document all details in the quarterly Technical Performance Report and accompanying Narrative Reports.

**6. What if an HVRP grantee needs to reduce program operations due to COVID-19?**

Grantees should follow CDC and state and local government guidance in making determinations related to whether and how staff conduct grant operations, and should consider the environment in which the work is being conducted and the risk of virus transmission. Many activities may be suspended or impacted and VETS is providing flexibility to grantees in how they provide services. Grantees can choose the best method to safely deliver program services. The security of participant data and its transmission as well as ease of participant access must be considered. Grantees who reduce or significantly alter grant operations should notify the GOTR with their plan for altering or scaling back operations, and its likely impact on outcomes and services. VETS is developing further guidance in response to the current circumstances.

**7. Does VETS have any resources to assist HVRP programs during the COVID-19 pandemic?**

The National Veterans' Technical Assistance Center has posted COVID-19 resources on [www.NVTAC.org](http://www.NVTAC.org), at <https://nvtac.org/topic/covid-19-resources/#post-3569>. Grantees are further reminded of [Veterans' Program Letter \(VPL\) 05-19](#), which allows HVRP grantees to provide emergency services outside of their location and allows for a larger stand down award.

**8. Can HVRP grantees report placements into temporary employment?**

Yes, [VPL 02-17, Attachment \(1\) Technical Assistance Guide \(TAG\)](#), provides guidance for reporting placement outcomes and exiting participants. Should a grantee choose to report a placement outcome for temporary employment, they should include this placement on the Technical Performance Report (TPR) and exit the participant at the end of the reporting quarter. However, if a grantee chooses not to report a placement outcome for temporary employment, they can continue to work directly with the participant providing supportive services and training with the goal of long-term employment. Once a grantee reports a placement outcome and the participant is exited, if the participant loses the employment and cannot find reemployment within the quarter, per the TAG, it counts against the grantee's retention outcomes.

Grantees should contact their GOTR if they have additional questions or concerns.

**9. Can grantees use funds to purchase cleaning supplies?**

Yes, to the extent that the supplies are used for the benefit of the grant program (e.g., in grantee spaces or a proportionate share of shared spaces).

**10. Is it an allowable charge to a grant if an employee works on COVID-19-related functions (e.g., sanitizing the building, etc.) and not grant-related functions?**

Assisting in the cleaning and sanitizing of dedicated and common space that is used to house and serve program staff and participants is an allowable grant function.

**11. Can grantees purchase laptops and tablets for participants so they can continue their education and training from home? Are laptops and tablets equipment? Do grantees need prior approval from the grant officer to purchase these?**

Yes, grant funds can be used to purchase supplies or equipment to assist in providing program services and training in a virtual setting during this time. The definition of equipment is found at [2 CFR 200.33](#). The definition of supplies is found at [2 CFR 200.94](#). Laptops and tablets fall within the definition of supplies, which do not need grant officer approval. However, it may require a budget modification. Work with your GOTR to ensure you are properly following all rules and regulations.

**12. Can federal funds be used to pay staff unable to work given a state's directive not to report to work, or suspension of operations in conformity with state guidance, and/or guidance from the CDC?**

Yes, under Office of Management and Budget (OMB) Memoranda M-20-11 and M-20-17, a leave policy is allowable if it is an established, written policy that applies equitably and consistently to all staff regardless of employee class, and if it is reasonable. However, a grantee can only charge an employee's paid-time-off to the federal grant if it is the grantee's overarching policy to pay all employees in this situation, regardless of the funding source used to cover such an expense. If a grantee amends its existing leave policy or develops a new emergency leave policy applicable to all employees affected by the COVID-19 pandemic, costs incurred under that policy would be allowable provided they meet the requirements in OMB Memoranda M-20-11 and M-20-17.

**13. What if an organization has been awarded a Stand Down but needs to reschedule the event?**

At this time grantees should adhere to all federal and state restrictions and guidance regarding gathering in groups, social distancing, and other measures deemed appropriate to curtail the spread of COVID-19. Please contact your GOTR, then submit a modification with an anticipated revised timeline. If approved, the Grant Officer will issue a Notice of Obligation with a new effective date for the award, the Modification will need a transmittal memo and a new SF-424.

**14. Due to COVID-19, there is a delay in requesting DD-214s from the National Archives and Records Administration. Can a grantee still enroll participants and provide services without proof of eligibility?**

Per VPL 06-19, grantees are required to have a copy of the DD-214 in the participant case file. If a participant does not have a DD-214 at the point of entry into the program, the grantee is encouraged to [request a copy through the National Archives and Records Administration](#). An individual must be a veteran to be eligible to participate in the HVRP program. The request for a DD-214 should be in the participant's case file until the official document becomes available. To establish provisional eligibility before the DD-214 becomes available, the grantee can ask specific questions during the intake that support proof of veteran status such as dates of service, type of service (i.e., Active Duty, Guard, Reserve), and type of discharge. This is a suggested list and does not need to be limited to these questions.

If the documentation from the archives indicates the participant is not eligible in accordance with VPL 06-19, the participant will have to be disenrolled and the cost of services/training will have to be reimbursed.