

VETERANS' PROGRAM LETTER NO. 02-23

TO: ALL VETERANS' EMPLOYMENT AND TRAINING SERVICE (VETS) STAFF

ALL VETS COMPETITIVE GRANT RECIPIENTS

FROM: JAMES D. RODRIGUEZ, MA

Assistant Secretary

SUBJECT: Homeless Veterans' Reintegration Program Participant Eligibility

I. Purpose:

This Veterans' Program Letter (VPL) establishes participant eligibility for the Homeless Veterans' Reintegration Program (HVRP) to help VETS grantees succeed in their efforts to reintegrate veterans experiencing and at risk of homelessness. The Veterans Benefits and Transition Act of 2018 amended the eligibility requirements and the Departments of Labor, Health and Human Services, Education, and Related Agencies Appropriations Act of 2020 (and subsequent appropriations laws) expanded eligibility in the following programs: HVRP; the Incarcerated Veterans' Transition Program (IVTP); and the Homeless Women Veterans and Homeless Veterans with Children reintegration grant program (HWVHVWC). Collectively, these programs are referred to as HVRP.

II. Summary of Changes:

The following is a list of changes from VPL 01-21:

- A. Updated the definition of eligible Veteran, to include certain criteria for National Guard and Reserve members;
- B. Explained eligibility documentation required within participant case files;
- C. Clarified that Hospital Inquiry (HINQ) or Status Query and Response Exchange System (SQUARES) documentation is acceptable as provisional source documents to expedite enrollment; however, a DD-214 (or the U.S Department of Veterans Affairs (VA) Summary of Benefits letter, only when appropriate) must be requested within three days of enrollment and must be included in the participant case file prior to the participant exiting the program;
- D. Revised the limitation on the number of participants "at risk of homelessness;"
- E. Clarified that grant recipients are required to document the participant's circumstances of homelessness through the participant's self-attestation if no documentation exists or can be obtained. For the "at risk of homelessness"

- category however, self-attestation should only be used in rare instances if no documentation exists or can be obtained. Documents justifying "at risk" are typically readily available; and
- F. Specifically identified Homeless Women Veterans and Homeless Veterans with Children as a category of HVRP eligibility.

III. References:

- A. Title 38 U.S.C. Chapter 20, as amended by Section 701 of the Veterans Benefits and Transition Act of 2018 (Public Law 115-407), specifically:
 - 1. 38 U.S.C. § 2021, Homeless Veterans' Reintegration Programs
 - 2. 38 U.S.C. § <u>2021A</u>, 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. Title 42 U.S.C. § <u>11302</u>, Section 103 of the McKinney-Vento Homeless Assistance Act: General Definition of Homeless Individual, as amended, by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009
- C. Title 42 U.S.C. § <u>1437f</u>(o)(19), U.S. Department of Housing and Urban Development-Veterans Affairs Supportive Housing (HUD-VASH) program and Tribal HUD-VASH program
- D. Title 42 U.S.C. § 11360(1), At Risk of Homelessness
- E. Title 25 U.S.C. § <u>4101</u> *et seq.*, Native American Housing Assistance and Self Determination Act of 1996
- F. Title 38 U.S.C. § <u>2044</u>, Veterans Affairs Rapid Re-Housing and Prevention Program
- G. Public Law <u>116-94</u>, Division A: Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Act, 2020
- H. VPL <u>02-17</u>, Quarterly Reporting Guidance for Competitive Grant Recipients and Non-Competitive Stand Down Grant Recipients, dated February 14, 2017

IV. Rescissions:

- A. VPL 01-21, Homeless Veterans' Reintegration Program Participant Eligibility
- B. Grant Officer Memorandum 01-21 Change 1, HINQ and SQUARES Alternate Source Document to Establish Homeless Veterans' Reintegration Program Eligibility
- C. Grant Officer Memorandum 01-21 Change 2, HINQ and SQUARES Alternate Source Document to Establish Homeless Veterans' Reintegration Program Eligibility

V. Categories of HVRP Eligibility:

- A. Homeless veterans (including veterans who were homeless but found housing during the 60-day period preceding the date on which the veteran begins to participate in a program under this section);
- B. Veterans who, at program entry, are at risk of homelessness within the next 60 days;
- C. Veterans participating in the HUD-VASH/Tribal HUD-VASH or SSVF programs;
- D. Veterans who are receiving assistance under the Native American Housing Assistance and Self Determination Act of 1996 (25 U.S.C. § 4101 *et seq.*);
- E. Homeless women veterans and homeless veterans with children;
- F. Veterans recently released from incarceration who are at risk of homelessness; and
- G. Veterans transitioning from incarceration.

See Attachment 1: Eligibility Definitions

VI. Identifying and Verifying Status:

To provide HVRP services, grant recipients must collect, in an individual's participant case file, source documentation of eligibility, to include a DD-214 that provides the character of discharge (any one of copies 2–8), as well as collect necessary information on veterans seeking services in order to correctly record the veteran's eligibility category. For individuals who are eligible for the HVRP program per the criteria outlined in Attachment 1 (specifically National Guard and Reserve members who received a service-connected disability resulting from a disease or injury incurred or aggravated in line of duty per 38 U.S.C. § 101(24)), and were not issued a DD-214, the grant recipient must obtain a copy of the VA Summary of Benefits letter to verify the service-connected disability rating.

In some situations, a DD-214 (or the VA Summary of Benefits letter, only when appropriate) is not readily available. Veterans may request records from the VA or National Personnel Records Center. Instructions for doing so are in Attachment 2.

In order to expedite services, VETS will allow grant recipients to provisionally enroll, provide services to, and report veteran participation and job placement on the quarterly VETS Technical Performance Report and Narrative using two alternative source documents:

- The VA HINQ, a request that is sent to the Veterans Benefits Administration (VBA) from the VA Medical Center for information pertaining to a veteran; or
- The VA web application (SQUARES), that provides external homeless service organizations information about veteran eligibility.

Both VA inquiry systems are free of charge. Each grant recipient must request their own access by following the instructions in Attachment 2.

While it is acceptable for grant recipients to provisionally qualify participants using HINQ or SQUARES as alternative source documents, a copy of the DD-214 (or the VA Summary of Benefits letter, only when appropriate) must ultimately be provided for each participant. Failure to do so may result in disallowed costs for these participants.

Within three (3) business days of HINQ- or SQUARES-based enrollment, grant recipients must request a copy of the DD-214 (or the VA Summary of Benefits letter, only when appropriate). Proof of the timely request for the DD-214 or the VA Summary of Benefits letter, when appropriate, must be included in the participant case file with the alternative source documents.

It is the grant recipient's responsibility to follow up on requests for DD-214s (or the VA Summary of Benefits letter, only when appropriate). If grant recipients need technical assistance in how to request these documents, please contact your Grant Officer's Technical Representative (GOTR). A DD-214 (or the VA Summary of Benefits letter, only when appropriate) must be included in the participant case file prior to the participant exiting the program. Failure to do so may result in disallowed costs for these participants, and grant recipients must immediately remove these participants from the U.S. Department of Labor (DOL) performance reporting forms.

Grant recipients are required to document the participant's circumstances of homelessness and eligibility category, as referenced in Section IV above, within the participant case file. For the "at risk of homelessness" category self-attestation should only be used in rare instances to document the circumstances. HVRP grant recipients will be required to report enrollments of homeless participants and those at risk of homelessness separately.

VII. Monitoring:

HVRP retains its primary focus of serving veterans experiencing homelessness; however, veterans at risk of homelessness are also eligible for program services. The number of enrollments that come from the "at risk of homelessness" category can vary depending on local circumstances. GOTRs should regularly monitor the mix of homeless and "at risk of homelessness" participants to ensure enrollments reflect the needs of the grant recipient's service delivery area.

Per VPL 02-17, or the most recent VPL on Quarterly Reporting Guidance for Competitive Grant Recipients and Non-Competitive Stand Down Grant Recipients, grant recipients are required to submit fiscal and performance reports on a quarterly basis to comply with grant reporting requirements. VETS also requires the GOTR to complete on-site assessments, including a randomized review of participant case files. In accordance with section V of this VPL, participant case files must include documentation of eligibility. Grant recipients that have incomplete participant case files may be subject to corrective action, removal of participants, and disallowance of costs incurred in support of HVRP participants erroneously enrolled.

VIII. Inquiries:

All inquiries are to be directed to the appropriate GOTR.

IX. Expiration Date:

This VPL will be reviewed for relevance on or before February 1, 2026. It shall remain in effect until rescinded or superseded.

X. Attachments:

Attachment 1: Eligibility Definitions

Attachment 2: U.S. Department of Veterans Affairs (VA) Inquiry Systems and Service

Record Links