

U.S. Department of Labor
Veterans' Employment and Training Service

VPL 03-24 Attachment 2:
HVRP High Risk Designation
Technical Assistance Guide



INTRODUCTION

In accordance with VPL 03-24, Homeless Veterans' Reintegration Program Performance, Management, and Reporting, a grant recipient may be considered "high risk" (HR) if they fail or are unable to comply with federal statutes, regulations, or the terms and conditions of the federal award. The Grant Officer (GO) is the sole authority to designate a grant recipient as HR. An HR designation is intended to address circumstances where the grant recipient is unable to improve and achieve outcomes and is designed to mitigate the risk of continued non-compliance or failure to achieve performance of HVRP goals. The Grant Officer's Technical Representative (GOTR) is responsible for the monitoring and oversight of the Homeless Veterans' Reintegration Program (HVRP). The GOTR, as assigned in the Notice of Award, will recommend a grant recipient be designated as HR in accordance with VPL 03-24.

STEPS TO DESIGNATE HIGH RISK

A GOTR will request, with the concurrence of the Regional Administrator for Veterans' Employment and Training (RAVET), that the GO designate a grant recipient as HR if the recipient fails to meet minimum performance expectations for at least three of the following indicators for three consecutive quarters:

1. Enrollments;
2. Average Hourly Wage at Placement;
3. Placement Rate;
4. Placement Rate Episodically Homeless/Cost per Placement; or
5. Percentage of Enrollments Trained.

Additionally, other conditions for HR include, but are not limited to, financial performance or irregularities; inability to submit timely and/or accurate reports; inability to communicate with the GOTR and/or respond to inquiries timely or accurately; and inability to conform to the terms and conditions of current or previous awards.

Once the GOTR and RAVET concur that the circumstances, documentation, and actions the GOTR has taken to address the issues support an HR designation, the GOTR will prepare the following documents for RAVET approval:

1. A transmittal memorandum summarizing the request for an HR designation, including a recommendation of the HR condition(s) that can be applied to improve performance or resolve the area of non-compliance, including but not limited to:
 - Requiring payments on a reimbursement basis;
 - Withholding authority to incur additional expenditures until receipt of evidence of acceptable performance within a given period of performance (issuing a stop work order to the grantee);
 - Requiring additional or more detailed financial, program, or performance reports;
 - Requiring additional program monitoring;

- Requiring the grant recipient or grant subrecipient to obtain technical assistance from the National Veterans Technical Assistance Center (NVTAC); or
 - Establishing conditions for additional prior approval.
2. All documentation relevant to underperformance or non-compliance, including TA provided by the GOTR (including but not limited to email correspondence, letters, reports, on-site reviews, etc.), and actions taken by the grant recipient to correct the area(s) of concern.

If the RAVET concurs with the recommendation, they are to forward the request to the GO through the National Director of Grants and Training.

GRANT OFFICER'S HIGH-RISK DETERMINATION

The GO considers HR designation on a case-by case basis, based on the unique circumstances surrounding the request. HR designations are used to address circumstances where TA, CAPs, and other interventions have failed to correct areas of concern. The GO may:

- Review submitted documentation to evaluate the risk associated with non-performance and/or non-compliance with the federal award;
- Request additional information; and/or
- Coordinate a meeting with appropriate federal staff involved to review the GOTR's documentation.

If the GO determines an HR designation is appropriate, the grant recipient's award will be designated as HR. The GO will notify the grant recipient in writing by official correspondence with a copy to the RAVET and GOTR, and a copy will be filed in GrantSolutions as correspondence. The letter will contain, at a minimum:

- The nature of the additional requirements;
- The justification for the additional requirements;
- The action(s) needed to remove the additional requirements, if applicable;
- The deadline for completing the action(s), if applicable; and
- The procedure for requesting reconsideration of the additional requirements imposed.

If the GO does not concur with the HR recommendation, the GO will notify the Office of National Programs' (ONP) Director of Grants and Training and provide the reason(s) for the determination. The Director will inform the RAVET and GOTR. The GOTR will continue to address the issues that caused the GOTR concern and should reevaluate the risk again in the next quarterly review to determine if improvements have been made. At the end of the quarterly review, the GOTR may follow these steps to resubmit a request for an HR designation if the situation warrants it.

MONITORING A HIGH-RISK GRANT

The GOTR is responsible for monitoring to ensure the grant recipient is following the HR conditions and reporting requirements and for providing technical assistance to the grant recipient. The GOTR will properly document and record monitoring and follow-up activities in the grant file. The GOTR may also engage NVTAC for support in providing technical assistance.

REMOVAL OF HIGH-RISK DESIGNATION

If additional conditions were added to the federal award, the grant recipient must address the additional conditions and submit supporting documentation, as appropriate, to demonstrate that the HR designation should be removed. If the GOTR believes the issues resulting in the condition(s) are resolved, the GOTR will recommend (via transmittal memo) through the RAVET and the ONP Director of Grants and Training for concurrence that the GO review the response to determine if the HR designation should be removed. If the GO deems the response acceptable, either in whole or in part, the GO will remove the additional condition(s) as appropriate.

The GO will notify the grant recipient in writing of the removal of any conditions and which additional conditions remain and still need to be addressed. The GO will provide the ONP Director of Grants and Training with a copy of the correspondence to the grant recipient. The Director will provide a copy to the RAVET and GOTR, and a copy will be filed in GrantSolutions as correspondence.

CONTINUED NON-COMPLIANCE/FAILURE TO ADDRESS THE ADDITIONAL CONDITIONS

If the grant recipient has not improved performance warranting removal of HR for more than three consecutive quarters or if the GO determines that the issues of non-compliance that resulted in HR have not been addressed or resolved, the GO may consider further action as described in [2 C.F.R. §§ 200.339-200.340](#). The severity of the issues and whether the issues were resolved by the end of the grant recipient's PoP may affect the grant applicant's future eligibility for federal awards. Should the GO decide to grant additional federal awards to the HR grant recipient, the GO can apply specific conditions to those newly assigned federal awards in accordance with [2 C.F.R. § 200.208](#).