



OFFICE OF POLICY, PROCEDURES AND TRAINING

James K. Whelan
Executive Deputy Commissioner

DHS-PB-2019-04

<p>SUBJECT:</p> <p>VA GPD Attendance Documentation and Annual Financial Reporting</p>	<p>APPLICABLE TO:</p> <p>All Parties Involved in the Programmatic Operations of VA GPD Funded Programs</p>	<p>ISSUED:</p> <p>March 4, 2019</p>
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<p>ADMINISTERED BY:</p> <p>Division of Adult Services Any DHS Division or Office Manager Provider Contracts and Veteran Affairs DSS Finance</p>	<p>APPROVED BY:</p> <p>Joslyn Carter, Administrator Department of Social Services/ Department of Homeless Services</p>
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■ PURPOSE

This procedure provides instructions on the use of per diem grants consistent with recommendations from the United States Department of Veteran’s Affairs (VA) and the New York City Department of Social Services’ (DSS) Office of Audit Services. The procedure addresses the findings of the Veteran’s Affairs Homeless Providers Grant/GPD Award Review (#8-724).

The VA Office of Internal Controls (OIC) performed a review to ensure that per diem grants are used in compliance with federal financial regulations and the Memorandum of Understanding between the Department of Homeless Services and the Grant Per Diem (GPD) Program Office.

GPD reimbursement for program costs depends on accurate reporting of the number of beds used to lodge clients per night. DHS staff and VA liaisons are responsible for ensuring that attendance records are maintained and consistent with VA payment vouchers.

For VA GPD programs, DSS Finance must submit an SF-425 Federal Financial Report form (**Attachment A**) annually. This form acts as an official request for reimbursement from the VA. Its contents are determined by the expenditures invoiced to the VA through the contract monitoring procedure (DHS PB #2019-XX) and the attendance verification data obtained through this procedure.

■ TERMS

48 Hour Curfew Policy: Shelter providers are required to contact DHS to exit clients from their assigned placement after 3 consecutive absences, beginning 48 hours from the time of the first missed curfew and verification of unit occupancy.

Note: DHS allowance for billable days is up to the first 48 hours of a client's exit from shelter.

Absence: A client is absent when they are not signed in for overnight lodging and are out of shelter past 8:00 the next morning.

Billing Day: A single lodging unit that spans part or all of each of two consecutive Care Days and both the client and the lodging provider have met all of the DHS specified requirements.

Care Day: A unit of time beginning at 8:00 am (inclusive) on a given calendar day up to 8:00 am (exclusive) the following calendar day.

CARES: Client Assistance and Rehousing Enterprise System is the agency's database for tracking clients in temporary shelter and is considered the system of record used to archive client lodging records and shelter invoices generated each month based on client lodging records.

CARES Daily Attendance Roster: A menu screen in the CARES database used by authorized individual shelter providers to update attendance values (Present, Absent, Late or Pass), and finalize the overnight status of clients checked in to their shelter units for overnight lodging.

Curfew: Shelter providers are responsible for implementing a curfew of 10:00 p.m. for single adults.

Overnight Lodging: A client that is properly "checked-in" to temporary shelter and is properly "signed in" for the night and remains past 8:00 am the following morning.

■ POLICY

This policy establishes documentation retention procedures for all parties involved in the programmatic operations of GPD funded programs to that ensure attendance records are accurately maintained and reported. The policy also provides guidance for the annual submission of the **SF-425 form (Attachment A)** to the GPD Program Office, a component of the contract monitoring procedure that relies on the data retained through the attendance documentation procedure.

The policy ensures compliance with the following federal financial management requirements:

- **38 Code of Federal Regulations §61.33(e) Payment of Per Diem**, states, “VA will not pay per diem for any additional days of absence when a veteran has already been absent for more than 72 hours consecutively (scheduled or unscheduled).”¹
- **2 Code of Federal Regulations (CFR) 200 Subpart D, Post Federal Award Requirements § 200.302 Financial management**, states, “(b) The financial management system of each non-Federal entity must provide for the following: (2) Accurate, current, and complete disclosure of the financial results of each Federal award or program in accordance with the reporting requirements set forth in §§ 200.327 Financial reporting and 200.328 Monitoring and reporting program performance”

■ PROCEDURE

I. Client Attendance Registry

Curfew for clients at GPD programs is 10 p.m., and they must sign-in between the hours of 10 p.m. and 12 a.m. The provider must ensure that this window is enforced. Provider and DHS staff conduct bed checks at 10 p.m., 12 a.m., and 2 a.m. to verify that clients who have signed in are lodged overnight. If a client violates curfew and fails to sign in over the course of the night, they are allowed 48 hours to return to shelter. If they do not return after this window closes, they are logged out of attendance records and are required to engage in a case conference with DHS and/or VA GPD liaisons at the Multi-Service Center (MSC), the central point for veterans’ services that is staffed by both DHS and the VA.

¹ Per the VA, the GPD model calls for a 48 hour curfew policy.

II. Attendance Documentation

1. Attendance Review

Attendance procedures for overnight lodging must be managed efficiently and in compliance with applicable policies and procedures that govern them. DHS is responsible for ensuring that the provider reports attendance accurately. This verification process involves a comparison of VA attendance records collected by the provider and CARES rosters.

2. Attendance Verification and Reporting

The Memorandum of Agreement for Project Number 08-724 between the U.S. Department of Veteran's Affairs and DHS states: "At the end of each month, VA will determine the total number of covered veterans for the Recipient and number of days each was provided housing. For each of these covered veterans, VA will pay the recipient the per diem amount multiplied by the number of days the Recipient furnished housing to the veteran." This information is recorded in an initial payment voucher.

At the end of each monthly period, the DHS administrative director receives a payment voucher from the VA which reflects attendance records collected by the provider. The DHS administrative director compares CARES rosters with the provider's data and verifies the attendance of clients registered to the GPD program.

Upon verification, the DHS administrative director reviews the voucher and compares its findings to the verified data. If discrepancies exist, the DHS administrative director reports them to the VA. The VA sends a revised voucher reflecting DHS attendance records. The DHS administrative director reviews and authenticates the final voucher to the VA.

If discrepancies do not exist, the DHS administrative director requests an official payment voucher from the VA using the VA Homeless Providers Per Diem Payment Voucher (**Attachment B**). The DHS administrative director signs the voucher and submits it to the VA.

3. Bill and E-Voicing

When the VA receives a verified invoice from the DHS administrative director, it submits the approved invoice to DSS Finance and GPD liaisons. DSS enters the approved invoice into the VA e-voicing system.

III. Annual Financial Reporting: **SF-425** Submission

The Per Diem Only Models Recipient Guide, Fiscal Reporting and Debt, states, “All Providers are required to complete the SF 425 Federal Financial Report (FFR) on an annual basis for each activity. Annual FFRs are due no later than 90 days after the end of the Federal Fiscal Year (September 30th).”

DSS Finance submits a **SF-425** Federal Financial Report annually (**Attachment A**) requesting reimbursement for GPD programs. FFRs must be submitted no later than 90 days after the end of the Federal Fiscal Year (September 30th). The financial report must include accurate information that reflects the invoice amount determined by the attendance record documentation and review.

Effective Immediately

■ ATTACHMENTS

Attachment A SF-425 Federal Financial Report

Attachment B VA Homeless Providers Per Diem Payment Voucher

■ RELATED ITEM

[DHS PB #2019-03](#) VA GPD Contract Monitoring Procedure

FEDERAL FINANCIAL REPORT

(Follow form instructions)

1. Federal Agency and Organizational Element to Which Report is Submitted		2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment)			Page	1	of
pages							
3. Recipient Organization (Name and complete address including Zip code)							
4a. DUNS Number	4b. EIN	5. Recipient Account Number or Identifying Number (To report multiple grants, use FFR Attachment)		6. Report Type <input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annual <input type="checkbox"/> Annual <input type="checkbox"/> Final	7. Basis of Accounting <input type="checkbox"/> Cash <input type="checkbox"/> Accrual		
8. Project/Grant Period From: (Month, Day, Year)			To: (Month, Day, Year)		9. Reporting Period End Date (Month, Day, Year)		
10. Transactions						Cumulative	
<i>(Use lines a-c for single or multiple grant reporting)</i>							
Federal Cash (To report multiple grants, also use FFR Attachment):							
a. Cash Receipts							
b. Cash Disbursements							
c. Cash on Hand (line a minus b)						0.00	
<i>(Use lines d-o for single grant reporting)</i>							
Federal Expenditures and Unobligated Balance:							
d. Total Federal funds authorized							
e. Federal share of expenditures							
f. Federal share of unliquidated obligations							
g. Total Federal share (sum of lines e and f)						0.00	
h. Unobligated balance of Federal funds (line d minus g)						0.00	
Recipient Share:							
i. Total recipient share required							
j. Recipient share of expenditures							
k. Remaining recipient share to be provided (line i minus j)						0.00	
Program Income:							
l. Total Federal program income earned							
m. Program income expended in accordance with the deduction alternative							
n. Program income expended in accordance with the addition alternative							
o. Unexpended program income (line l minus line m or line n)						0.00	
11. Indirect Expense	a. Type	b. Rate	c. Period From	Period To	d. Base	e. Amount Charged	f. Federal Share
g. Totals:							
12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:							
13. Certification: By signing this report, I certify that it is true, complete, and accurate to the best of my knowledge. I am aware that any false, fictitious, or fraudulent information may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)							
a. Typed or Printed Name and Title of Authorized Certifying Official					c. Telephone (Area code, number and extension)		
					d. Email address		
b. Signature of Authorized Certifying Official					e. Date Report Submitted (Month, Day, Year)		
					14. Agency use only:		

Standard Form 425
OMB Approval Number: 0348-0061
Expiration Date: 10/31/2011

Paperwork Burden Statement

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is 0348-0061. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0060), Washington, DC 20503.

Department of Veterans Affairs

**VA Homeless Providers
Per Diem Payment Voucher**

The Per Diem Payment Voucher is to be used after the recipient is determined eligible for per diem payments and should be submitted monthly to the VA Liaison. Who in turn will forward it to the GPD Field Office.

PROGRAM NAME AND ADDRESS City Of New York Department of Homeless Services 33 Beaver Street New York ,New York 10004	DATE 12/31/2018
PO NUMBER: 630-C95109	PROJECT NUMBER CONY434-0692-630-CT-18-0
	BILLING PERIOD: (mm/dd/yy to mm/dd/yy) 12-01-2018 TO 12-31-2018

BILLING AMOUNTS - Complete the appropriate sections below

Supportive Housing: The rate of per diem payments for each veteran in supportive housing shall be the lesser of (i) The daily cost of care estimated by the per diem recipient minus other sources of payments to the per diem recipient for furnishing services to homeless veterans that the per diem recipient certifies to be correct (other sources include payments and grants from other departments and agencies of the United States, from departments of State and local governments, from private entities or organizations, and from program participants), or (ii) The current VA State Home Program per diem rate for domiciliary care.

TOTAL NUMBER OF BED DAYS OF CARE	MULTIPLIED BY THE RATE OF PER DIEM	EQUALS	TOTAL AMOUNT REQUESTED	AMOUNT PAID BY VAMC
4252	\$45.79	=	\$194,699.08	

Service Centers: The per diem amount for service centers shall be one eighth of the lesser of the amounts in paragraphs (i) and (ii) for supportive housing above, not to exceed eight hours in any day (e.g., State Home Rate is \$34.40 then hourly rate is \$4.30).

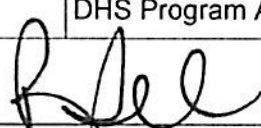
TOTAL NUMBER OF 1 HOUR VISITS	MULTIPLIED BY 1/8 RATE OF PER DIEM	EQUALS	TOTAL AMOUNT REQUESTED	AMOUNT PAID BY VAMC
		=		

VALIDATION - Complete the appropriate sections below:

SERVICE PROVIDER AUTHORIZED AGENT SIGNATURE: To the best of my ability I certify the billing requested is accurate, based on actual costs, and when divided does not exceed 100% of the daily cost of care, per veteran, per day.

NAME Rosy Gelin	TITLE DHS Program Administrator	DATE 02/13/2019
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SIGNATURE



VA GPD LIAISON VALIDATION SIGNATURE: To the best of my ability I certify the billing is accurate and the funds paid are for the services and/or housing that have been provided.

NAME Horace Bovell	TITLE GPD Liaison	DATE 02/13/2019
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SIGNATURE

After Completion Fax to: VA Homeless Providers Grant and Per Diem Program
@ (813) 979-3569

NOTE: Liaisons, when faxing completed voucher to GPD Office the daily census should not be included.