

# UNIFIED FUNDING AGENCY (UFA)

## STANDARD OPERATING PROCEDURES

Version One

### CONTINUUM OF CARE NY-522

CARES of NY, Inc.

Points North Housing Coalition Continuum of Care Board



V1 | Effective 3/24/2022

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# I. INTRODUCTION

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## PURPOSE

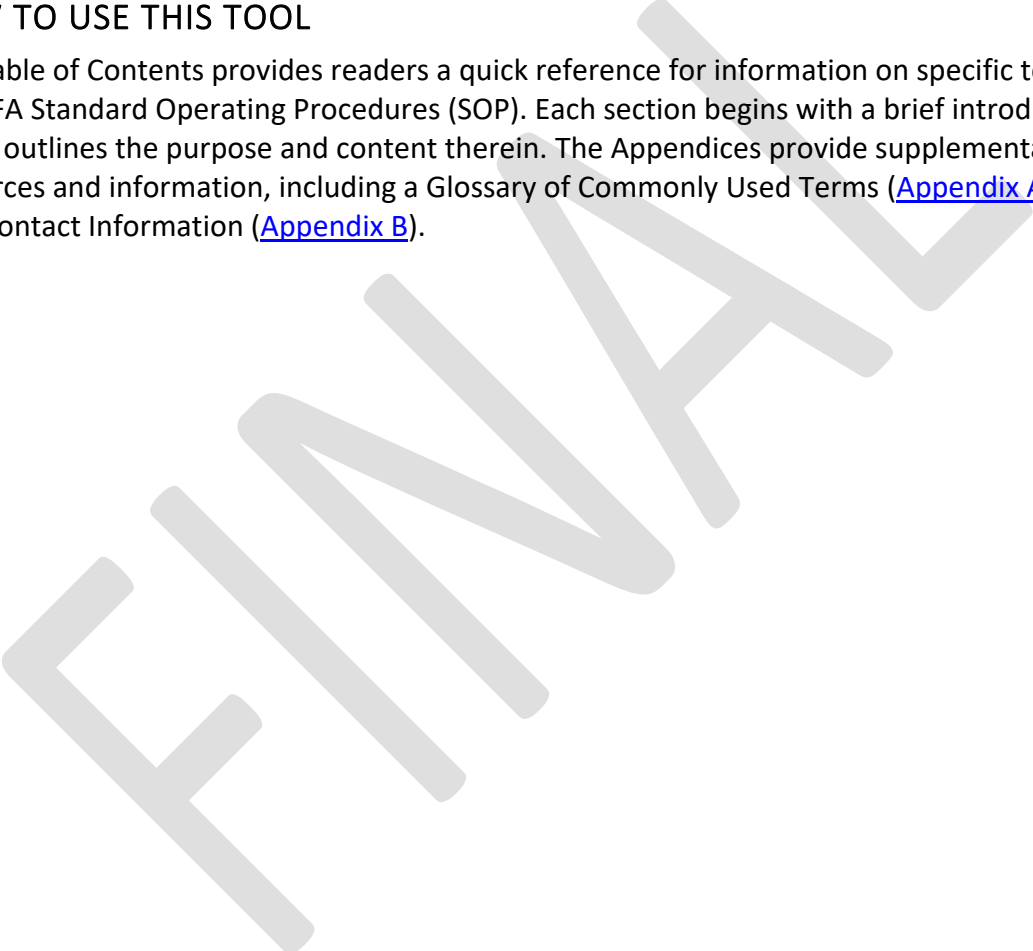
The purpose of this document is to outline the standard operating policies and procedures for the Unified Funding Agency (UFA) Program for the Points North Housing Coalition Board.

The guidelines herein dictate the actions to be performed to ensure an efficient Continuum-wide program, and to build consistency, structure, and controls to meet the regulatory requirements set forth for the Unified Funding Agency Program by the Department of Housing and Urban Development (HUD).

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## HOW TO USE THIS TOOL

The Table of Contents provides readers a quick reference for information on specific topics on the UFA Standard Operating Procedures (SOP). Each section begins with a brief introduction which outlines the purpose and content therein. The Appendices provide supplemental resources and information, including a Glossary of Commonly Used Terms ([Appendix A](#)) and UFA Contact Information ([Appendix B](#)).



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## BACKGROUND

The Unified Funding Agency (UFA) Program was established by the McKinney-Vento Homeless Assistance Act as amended by §896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. The Continuum of Care Program Interim Rule (first released in 2012 and last updated in 2017) then detailed the role of the UFA, defining it as an eligible applicant selected by a Continuum of Care (CoC) and approved by the U.S. Department of Housing and Urban Development (HUD) to receive and distribute funding for all projects funded within the CoC.

The benefits of UFA designation for the CoC and Community include:

- Ability for projects to scale up or down in the event resources are not efficiently used or demand proves higher than anticipated.
- Capacity to repurpose otherwise unspent (and potentially returned) funds.
- Improved response time to meet (changing) community needs throughout the contract year.
- Reduced administrative workload for projects; with UFA designation, subrecipients do not prepare or submit annual CoC Project Applications or Annual Progress Reports (APRs).

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### CARES of NY, INC.: Unified Funding Agency for the Points North Housing Coalition CoC Board

Due to the strength of the Continuum and the Collaborative Applicant (CARES of NY, Inc.) in the NY-522 Points North Continuum of Care (“the CoC”), CARES of NY, Inc. (CARES) became the CoC’s UFA designate in the 2019 CoC Program competition.

Specific strengths of the Continuum and CARES contributing to UFA approval include:

- Strong Board and Governance structures
- Clearly defined subcommittees contributing to system-wide communication and collaboration
- Demonstrated expertise by the Collaborative Applicant in grants management and working knowledge of HUD regulations and program requirements
- Effective monitoring processes (annual APR reviews and site visits, data quality memos) overseen and jointly carried out by CoC subcommittees and Collaborative Applicant staff

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### CONTRACT TERM

The contract term for CoC funded agencies (i.e., UFA subrecipients) is October 1<sup>st</sup> – September 30<sup>th</sup>.

## UNIFIED FUNDING AGENCY (UFA) GRANT ADMINISTRATION PROCESS

The figures below provide overviews of the grant administration process in CoCs with and without Unified Funding Agency (UFA) designation.

Figure 1 depicts the grant administration process in a Continuum **without** UFA designation, wherein the U.S. Department of Housing and Urban Development (HUD) maintains annual grant agreements with each CoC-funded agency and the Collaborative Applicant (CA) provides guidance to the CoC-funded agencies ([HUD UFA Webinar](#)).

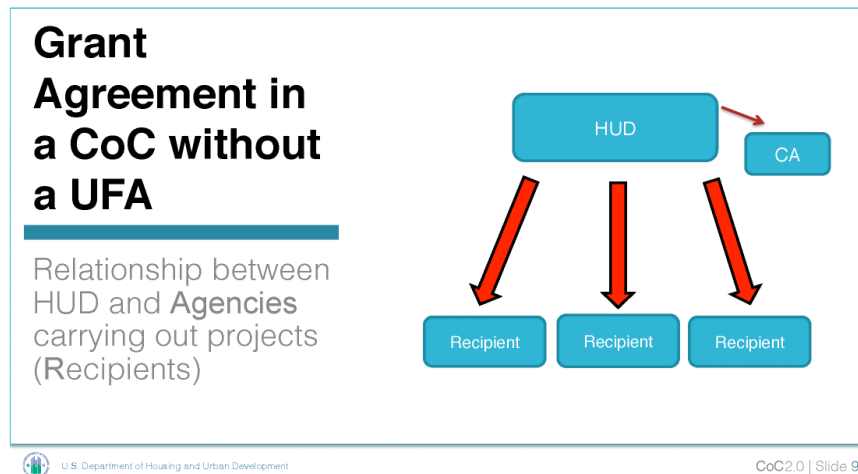
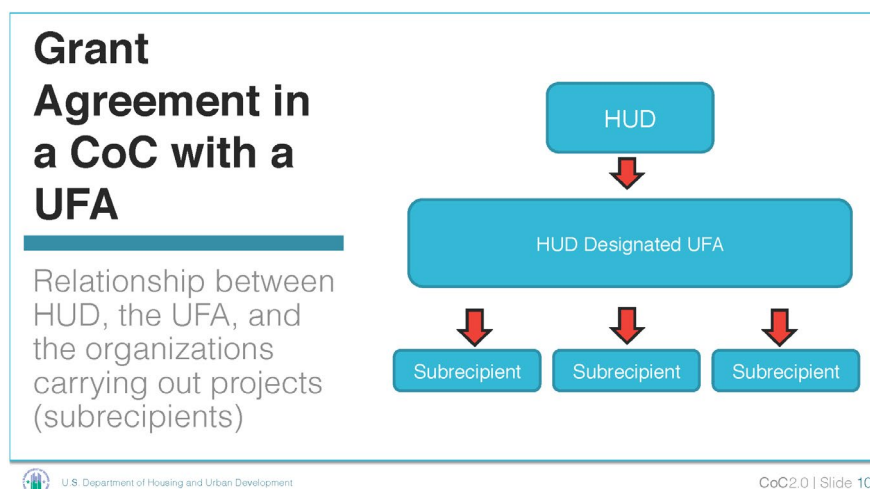


Figure 2 depicts the grant administration process for a Continuum **with** UFA designation, wherein the UFA is the direct HUD grantee and maintains annual subrecipient agreements with each CoC-funded agency ([HUD UFA Webinar](#)). The Collaborative Applicant becomes the UFA.



# II. UNIFIED FUNDING AGENCY ROLES & RESPONSIBILITIES

This section describes the Unified Funding Agency (UFA) operating system and details the roles and responsibilities of the U.S. Department of Housing and Urban Development (HUD), the Collaborative Applicant (CARES of NY, Inc.), CoC-funded agencies (subrecipients), and interested stakeholders of the NY-522 Points North Housing Coalition Continuum of Care under UFA designation.

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## U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD): FUNDER

Under Unified Funding Agency (UFA) designation, HUD remains the legal authority in the implementation and operation of the CoC program. As such, HUD:

- Makes annual funding decisions for all CoC funded projects.
- Determines community priorities and performance targets, in collaboration with the CoC.
- Establishes the legally binding contract (grant agreement) with the designated UFA (CARES) for the entire CoC.
- Maintains direct communication primarily with the UFA; and
- Monitors the UFA and subrecipients.

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## CARES OF NY, INC. (CARES): UNIFIED FUNDING AGENCY (UFA)

Under UFA designation, CARES is legally responsible to HUD as a direct grantee, as well as to the Continuum and subrecipient member agencies. As such, CARES:

- Enters into a legally binding grant agreement with HUD for the UFA-designated contract year for the funding amount awarded for all CoC funded projects.
- Contracts with each CoC-funded agency, for all projects within the agency that are HUD funded, for the UFA-designated contract year.
- Applies as a single entity to HUD each year during the CoC Program Competition for all new, renewal, and planning funding for CoC projects for the UFA-designated contract year.
- Reapplies for UFA designation each contract year.
- Executes drawdowns and disburses funding to subrecipients.
- Monitors subrecipients for programmatic and fiscal compliance at least annually.
- Submits all required documentation to HUD (e.g., APRs, budget amendments, etc.).
- Tracks project spending to identify potential unspent funds available for repurposing during the UFA-designated contract year.
- Notifies the Fiscal Advisory Committee of any budget modifications.
- Obtains approval from the CoC Board regarding any proposed budget amendment prior to submitting a formal request for amendment to HUD; and
- Adheres to all policies and procedures as described within this manual.

See [Appendix B](#) for Unified Funding Agency (UFA) Contact Information.

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## COC-FUNDED AGENCIES: UNIFIED FUNDING AGENCY (UFA) SUBRECIPIENTS

Agencies awarded CoC funds are considered subrecipients of the UFA, and as such, agencies:

- Compose an annual letter of support for CARES of NY, Inc. as the UFA.
- Enter into a legally binding grant agreement with the UFA for the HUD awarded amount and scope of work in the CoC Program application including program match information and relevant fiscal updates (e.g., annual audit dates, Single Audit requirements, program income applicability, etc.).
- Comply with all program requirements and budget obligations as stated in the CoC Program application.
- Follow fiscal policies and procedures as outlined in this manual and agreed upon by the CoC.
- Appoint at least one (1) financial representative to be part of the Finance Advisory Committee who must attend at least four out of six bi-monthly meetings, and if unable to attend a meeting, will put forth effort to find substitute from their agency to fill their absence. Attendance is critical to ensuring agency participation in and awareness of the fiscal matters of the Continuum.
- Monitor their own contracts to ensure that the grant will be spent in its entirety, otherwise alert CARES of available redirected funds as soon as possible.
- Respond timely to inquiries for UFA monitoring to ensure project compliance.

After becoming an UFA subrecipient vs. HUD subrecipient, CoC agencies are no longer required to:

- Submit project applications in E-Snaps.
- Complete Annual Performance Reports (APRs) within Sage.
- Manage financials through ELOCCS (vouchers); or
- Complete annual ELOCCS certification.

See [Appendix C](#) for a complete list and descriptions of FY20 CoC-Funded Projects.

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## CONTINUUM OF CARE BOARD

In collaboration with HUD, the CoC Board / NY-522 Continuum of Care (CoC) remains responsible for:

- Determining community and funding priorities; and
- Approving or rejecting all projects that apply for CoC funding.

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## COC BOARD

The CoC Board remains responsible for:

- Reviewing and providing feedback on fiscal policies and procedures.
- Reviewing and approving the Standard Operating Procedures (SOP).

- Reviewing and approving any changes in ELOCCS; and
- Providing approval for projects eligible for redirected CoC funds.

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## COLLABORATIVE APPLICANT

With Unified Funding Agency (UFA) designation, CARES (as the Collaborative Applicant) is required to:

- Reapply annually for continued UFA designation.
- Apply for a Continuum of Care grant on behalf of the entire CoC.
- Continue with required and agreed-upon responsibilities (as outlined in the annual Statement of Work) including successfully submitting of the annual application.
- Submit the annual Housing Inventory Count (HIC) and Point-in-Time (PIT); and
- Ensure that the Continuum adheres to governance policies and procedures.

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## FISCAL ADVISORY COMMITTEE

The Fiscal Advisory Committee (comprised of financial representatives from each CoC funded agency) provides feedback and makes recommendations to the UFA on:

- Financial policies and procedures.
- Financial reports; and
- This Standard Operating Procedures (SOP) manual.

The Fiscal Advisory Committee will continue to assist in the execution of the following tasks:

- Ensure funded agencies adhere to financial policies and procedures as outlined in the SOP.
- Bi-monthly review of project spending, budget modifications and amendments for possible redirecting of funds; and
- Review fiscal monitoring results of each CoC program.

# III. UNIFIED FUNDING AGENCY FINANCIAL MANAGEMENT

This section outlines the policies and procedures for entering into contracts, reimbursing projects, monitoring agencies, and auditing subrecipients of CARES of NY, Inc. (as UFA).

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## FINANCIAL ROLES & RESPONSIBILITIES

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### UNIFIED FUNDING AGENCY (UFA)

As UFA, CARES must:

- Ensure adequate separation of duties among its staff so no single individual has authority over an entire financial transaction (e.g., reviewing vouchers, processing ELOCCS drawdowns, receiving funds, and managing financial records).
- Receive, review, and approve or deny all requests from subrecipients (e.g., vouchers, budget modifications) and provide a response within ten (10) business days; and
- Draw down funds from ELOCCS and reimburse subrecipients in a timely manner.



**Figure 3.** CARES' staff roles in financial transactions.

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### CARES SENIOR FUNDING ANALYST

The Senior Funding Analyst is responsible for:

- Reviewing all vouchers for completion and accuracy based upon approved budgets.
- Requesting clarification on or resubmission of vouchers, when necessary, from agencies; and
- Educating UFA subrecipients on vouchering procedures.
- Forwarding approved vouchers to the Finance Team monthly for review and approval for LOCCS drawdown
- Maintaining copies of all approved vouchers.
- Tracking grant spending.
- Monitoring monthly spending totals per project and communicating with any agency with projected under-spending to review possible need to redirect funds.
- Preparing budget modification forms for Fiscal Advisory Committee review.
- Updating vouchers per budget modifications.
- Preparing budget modification letters for HUD approval

- Overseeing redirected funds application collection.
- Communicating with Director of Grants and Operations regarding redirect awards and subaward amendments, including agency, project, and amount being redirected or amended.
- In coordination with the Compliance Officer, oversee the annual monitoring of subrecipients

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## DIRECTOR OF GRANTS AND OPERATIONS

The CARES Director of Grants and Operations is specifically responsible for:

- Maintaining copies of all active grant documentation.
- Maintaining active ELOCCS authorized user status.
- Entering Finance Team approved amount of funds from vouchers into ELOCCS.
- Resolving any error messages received by the ELOCCS system.
- Once funds are received from HUD, enter approved ACH transactions to initiate wire transfer to sub recipients.
- Notify Senior Funding Analyst and Finance Team of subrecipient payments.
- Review budget modifications for accuracy with contract.
- Create contracts and addendums for awarded redirected funds.

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## FINANCE TEAM

The CARES Finance Team is responsible for:

- Review of the accuracy of voucher totals and ELOCCS totals.
- Submitting approved ELOCCS drawdown and ACH summary (monthly) to Director of Grants and Operations.
- Reviewing accuracy of ELOCCS deposit to bank account.
- Reviewing accuracy of all ACH payments per agency.
- Reconciling CARES bank account monthly.

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## UNIFIED FUNDING AGENCY (UFA) SUBRECIPIENTS

Subrecipients are responsible for:

- Submitting a voucher to CARES at least once every 90 days (monthly submission is strongly recommended in order to track real time spending).
- Maintaining appropriate source documentation for vouchers, including but not limited to costs related to:

- Personnel Services (time sheets, payroll journal, time & effort reporting).
- Rental Assistance (address of tenants, amount of rent paid, check number and date, bank statements reflecting expenses including copies of cancelled checks).
- Security Deposits (name and address of tenants, amount of security paid, check number and date, bank statements reflecting expenses including copies of cancelled checks).
- Utility Assistance (address of tenant, amount of assistance paid, check number and date, letter of termination from utility provider, bank statements reflecting expenses including cancelled checks).
- Equipment & Supplies (copies of receipts, check number and date, and indicate the payee, bank and/or credit card statements reflecting expenses); and
- Other Expenses (copies of receipts, check number and date or bank statement, bank and/or credit card statements showing expenses)
- Determining project match and securing documentation of source and use to be kept on file for monitoring.
- Providing a letter of commitment to provide 25% match per project budget to the UFA for upload into the annual CoC funding application: and
- Complying with all general HUD fiscal procedures.

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#### UNIFIED FUNDING AGENCY (UFA) SUBRECIPIENT RECOMMENDATIONS

Subrecipients are **strongly encouraged** to:

- Review and understand their **Subrecipient Agreement** and all requirements contained therein.
- Submit a completed voucher to CARES each month.
- Ensure their agency has a financial system in place to track and document all expenses in accordance with the Federal Awards Uniform Administrative Requirements including noting the program CFDA number within the Chart of Accounts associated with the agency's UFA projects where applicable.
- Ensure project staff understand project specifications, including their role in tracking and documenting expenses; and
- Discern distinctions among Program Administrative Costs, Program Costs and Overhead/Agency Administrative Costs:
  - Program Administrative Costs: Costs related to the management, oversight, coordination, monitoring and evaluation of a specific project.
  - Program Costs: Costs directly related to program activities (e.g., time spent issuing checks to landlords is directly related to the Rental Assistance line item and is therefore a Rental Assistance Project Cost); and

- Overhead/Agency Administrative (Indirect) Costs: Costs that support the entire agency, rather than the project.
  - Note: Overhead/Agency costs are not reimbursable except under an approved indirect cost rate (including de minimus).
  - Subrecipient Agreements will indicate if an agency may charge indirect costs.

FINAL

## UFA CONTRACTS WITH SUBRECIPIENTS

- Contracts for subrecipients are administered after CARES executes a formal grant agreement with HUD.
  - If a subrecipient does not sign their contract, generally they are not eligible to receive any of their grant award until the contract is executed.
- If subrecipients subcontract out any portion of their grant award, they must also ensure that CARES has a fully executed copy of the sub agreement including a signature from CARES.
  - If the subrecipient's subcontract(s) are not executed, even if the main contract is executed, the subrecipient is not eligible to receive their grant award.
- At the time of contract execution, the subrecipient must list their match source(s), note any findings on their audit, and attest that program income is used for eligible expenses.
  - Match sources will be used to report match to HUD; CARES may ask for a letter and/or proof of match during the grant year.
  - CARES will review all subrecipient audits to review findings and work with the subrecipient to resolve issues.
  - Any remediation of findings will be addressed during fiscal monitoring.
- Contract budget modifications and amendments will be recognized with executed contract addendums documenting the date of change and the date that funds may be vouchered for in addition to the subrecipient receiving a new voucher.
- If a new project is created through redirection, that contract is only eligible to expend awarded funds beginning on the day their contract is fully executed.

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## UFA BUDGET MODIFICATIONS & AMENDMENTS

Budget modifications and amendments, which document shifting of funds between projects, activities, and subrecipients, enable projects to scale up or down if resources are underutilized or if client demand proves higher than anticipated.

Per HUD regulations:

- Funds may be shifted only, if necessary, to improve services to eligible populations within the CoC, and with the assurance that all contract and NOFA priorities will continue to be met.
- If the budget modification is less than 10% of the original HUD approved budget line funds combined for all CoC funded agencies, CARES (as UFA) may shift funds during a single contract year without a formal amendment request through HUD.
- The HUD Regional Office has discretion regarding any budget line changes exceeding 10% of the original, overall, HUD approved, UFA grant budget in ELOCCS (the combined budget for all CoC funded projects).

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### POLICIES

Funds may not be moved between new and renewal grants.

With CoC oversight, CARES (as UFA) may move funds from one existing CoC project to another (regardless of component type) at any point through the close of the contract year.

Any change in ELOCCS requires Board approval, examples include:

From one budget line to another within a single CoC project

From one CoC project to another within the same CoC funded agency

(Agencies may not transfer to other agencies unless there is a subcontract already in place for the project, otherwise please see the section of the SOP regarding Redirection.)

Any permanent changes in targeted subpopulations, a permanent decrease in number of units, or shifts of a single eligible category of more than 10% in a single contract year is considered a Budget Amendment and requires CoC Board and HUD approval.

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### BUDGET MODIFICATION REQUEST PROCEDURE

To move funds from one budget line to another within a single CoC project OR from one CoC project to another project within the same CoC funded agency:

1. The UFA subrecipient (CoC-funded agency) must submit a *Budget Modification Request – Within a Project* (see [Appendix D](#) for template) OR a *Budget Modification Request – Transfer Between Projects* to CARES (see [Appendix E](#) for template).
2. CARES will review the request form and provide a response to the requesting subrecipient within ten (10) business days.

3. Agencies are limited to four modifications per project per year and may only request budget modifications quarterly during the contract year, by the 15<sup>th</sup> of December, March, June, and August. (Redirected funds do not count toward this limit.)

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## BUDGET AMENDMENT REQUEST PROCEDURE

To make any permanent changes to targeted subpopulations, number of units served, or monetary shifts of a single eligible category of more than 10% in a single contract year:

1. The Unified Funding Agency (UFA) subrecipient must submit a *Budget Modification Request Form* to CARES for initial review (see [Appendix D](#) for a modification within a project or [Appendix E](#) for modifications between projects).
2. CARES (as UFA) will review the request and, if necessary, will schedule a conversation (via phone or email) within ten business days.
  - a. Funds affected by the budget amendment will not be paid until the amendment is approved by HUD and funds are shifted within ELOCCS.
3. CARES (as UFA) will inform the Fiscal Advisory Committee of the budget amendment request and request CoC Board approval for moving funds.
4. CARES (as UFA) will provide the Continuum Board with both details of the request and any feedback received by the Fiscal Advisory Committee.
5. If approved by a majority of the CoC Board, CARES will forward the request to the HUD Regional Office.
6. CARES will then notify the CoC Board when HUD approves the amendment request.

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## POST-APPROVAL PROCEDURE

1. In the event of an approved internal budget modification, fund redirection, or budget amendment, CARES Senior Funding Analyst will email the agency to:
  - a. Inform the agency of approval.
  - b. Provide a new voucher form for each amended grant/project to agencies.
  - c. Provide a contract addendum reflecting approved change/s to the project budget, for signature by the agency.

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## VOUCHERING

As Unified Funding Agency (UFA), CARES is the direct HUD grantee and therefore responsible for reimbursement to subrecipient agencies for expenses claimed through (properly prepared and approved) vouchers. Per the Interim Rule of 24 CFR 578.85(c)2, the UFA will distribute the appropriate portion of funds to subrecipients within 45 days.

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### POLICIES

Subrecipient agencies will submit vouchers to request reimbursement for project expenses.

If an agency administers more than one CoC-funded project, they will be notified by CARES, as directed by HUD, which projects and expenditures will be consolidated on the voucher template.

Agencies must voucher each project at least once every 90 days and submit a single voucher for more than one month's expenditures submitted.

CARES (as UFA) will not complete or edit any vouchers.

Agencies may submit vouchers at any time for each voucher time period, but only properly completed vouchers submitted by the established deadline will receive reimbursement.

Reimbursement of vouchers will occur twice per month. The deadline to submit a voucher for reimbursement is **noon (12 pm) on the 5<sup>th</sup> or 20<sup>th</sup> of each month** or the next business day if the 5<sup>th</sup> or 20<sup>th</sup> falls on a weekend or holiday. The voucher submission deadline will not change to accommodate incorrect voucher submissions.

If vouchers are properly completed, requested funds will be received by agencies within ten (10) business days of the 5<sup>th</sup> or 20<sup>th</sup> of the month.

Agencies will be reimbursed only up to the amount each grant was awarded (as stated in the subrecipient contract). Agencies are responsible for monitoring, preventing, and resolving any overspending.

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### PROCEDURES

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#### VOUCHER SUBMISSION PROCEDURE & SCHEDULE

CARES will use an **electronic-only** submission process for vouchers (see [Appendix F](#) to view the voucher template.)

1. At the start of each fiscal year, CARES Senior Funding Analyst will email agencies a voucher form prepopulated with contracted budget details for each CoC project awarded.
  - a. Vouchers will be in Excel spreadsheet format.
2. Vouchers must be submitted via email to [pnufa@caresny.org](mailto:pnufa@caresny.org) no later than noon (12 pm) on the 5<sup>th</sup> or 20<sup>th</sup> of each month.

- a. If the 5<sup>th</sup> or 20<sup>th</sup> falls on a weekend or holiday, the deadline will extend to noon on the following business day.
  - b. Any unusual circumstances which may delay voucher submission (e.g., staff illness, facility emergency) must be communicated to the Senior Funding Analyst.
3. Vouchers received after the deadline will be processed the following month.

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#### VOUCHER PROCESS TIMELINE

IF VOUCHERS ARE PROPERLY COMPLETED, requested funds will be received by agencies within ten (10) business days. The process is as follows:

1. **BUSINESS DAY 1-3:** CARES Senior Funding Analyst completes programmatic review of vouchers (in the order received) for eligibility, accuracy and completion for payment and sends to CARES Finance Team to review fiscal accuracy. CARES Accounting gives CARES Director of Grants and Operations summary report for ELOCCS and ACH to subrecipients.
2. **BUSINESS DAY 4:** CARES Director of Grants and Operations processes drawdown from ELOCCS and notifies Senior Funding Analyst and CARES accounting when complete.
3. **BUSINESS DAY 5-6:** After funds are drawn down from ELOCCS, CARES Director of Grants and Operations processes payments for each subrecipient through an online banking portal.
4. **BUSINESS DAY 7-8:** Electronic payments/transfers will be processed within two (2) business days after drawdown from HUD
5. **BUSINESS DAY 9-10:** Funds will be available to agencies no later than business day 10 (following voucher submission deadline each month).

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#### PROCEDURE FOR INCORRECT VOUCHER SUBMISSION

Agencies are encouraged to submit vouchers early to allow time for any necessary corrections.

1. IF VOUCHERS ARE NOT PROPERLY COMPLETED, the Senior Funding Analyst will contact the agency to inform and request correction.
2. The agency must resubmit the corrected voucher within two business days for payment per the above voucher submission schedule in order to guarantee reimbursement in that month.

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#### REIMBURSEMENT TO AGENCIES

1. CARES will draw down funds at least once per month from ELOCCS.
  - a. See [Appendix G](#) to view the Unified Funding Agency (UFA) Credit Authorization Form.

2. CARES will transfer the appropriate funds to subrecipients' bank accounts within ten (10) days of the voucher submission deadline (excluding any incorrectly completed vouchers).
3. Funds will be transferred via ACH direct deposit in a single lump sum to the agency.
  - a. Funds for different budget lines will not be specified.
  - b. Agencies which submit more than one voucher (for multiple CoC-funded projects) will receive the sum of their vouchers in this single fund transfer.

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#### ADVANCE PAYMENT TO SUBRECIPIENTS

1. A situation may arise wherein subrecipients may need advance funds prior to their grant funds being available in ELOCCS but after the master contract between CARES and HUD is signed. If this situation occurs, subrecipients should:
  - a. Submit a letter detailing why the advance is needed, the amount requested, and include a guarantee that the funds will be repaid.
  - b. Subrecipients may only request rental assistance dollars.

**The decision to give any advance payment(s) is at the sole discretion of CARES and its Board of Directors.**

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#### VOUCHERS AFTER BUDGET MODIFICATIONS / AMENDMENTS

In the event of an approved internal budget modification, fund redirection or budget amendment, a new voucher form for EACH altered grant/project will be emailed to agencies to replace their previous voucher form by the Senior Funding Analyst.

# IV. REDIRECTION OF FUNDS

With Unified Funding Agency (UFA) designation, the CoC (via the UFA), may redirect funds within and across projects and agencies during a single contract year. Redirecting funds is key to assisting as many clients as possible and reducing the amount of unspent funds which would otherwise be returned to HUD.

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# FUND REDIRECTION

## POLICIES

An Expenditure Timeline & Threshold has been established to serve as a guide to ensure the maximum amount of funds are utilized each year.

Agencies should share knowledge of anticipated changes in project spending to allow for timely shifting of unspent funds to another qualified project.

When monies are available, redirecting funds will be considered at the start of the second and third quarters of each contract year.

## EXPENDITURE TIMELINE & THRESHOLD

The following timeline and spending thresholds will:

- Prompt discussions about spending plans; and
- Inform decisions to redirect funds

Table 1. Expectations for Project Expenditures / Vouchering

Timing	Expected % of Budget Spent	Discuss Spending Plan if Actual % Spent is	Shift Unspent Funds, unless spending plan is enacted (for other project use during the current contract year only)
Close of Q1 (Dec 20 <sup>th</sup> )	25%	< 15%	N/A unless agency shares knowledge of anticipated changes in project spending to allow for timely shifting of unspent funds
Close of Q2 (March 20 <sup>th</sup> )	50%	< 40%	< 30%
Close of Q3 (June 20 <sup>th</sup> )	75%	< 65%	< 55%
September 20 <sup>th</sup>	All budgets will be reviewed prior to final month of vouchering (vouchers for final project costs incurred through September 30 <sup>th</sup> should be submitted no later than October 20 <sup>th</sup> )		

## ELIGIBILITY CRITERIA TO RECEIVE REDIRECTED FUNDS

To receive redirected funds, an agency must be:

- A currently funded CoC agency
- A CoC member in good standing and operating without monitoring sanctions imposed by any of the following: Continuum Board, Fiscal Advisory Committee, Operations Committee, or HUD

- Meeting or exceeding spending thresholds for currently funded projects as outlined in the CoC Expenditure Threshold Policy & Procedure

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## PROCEDURES

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### PROCEDURE FOR VOLUNTARY REDIRECTION

1. An agency should immediately alert the Senior Funding Analyst if it is unable to expend all funds within a contract year.

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### PROCEDURE FOR INVOLUNTARY REDIRECTION

1. After the first quarter of vouchering is complete, CARES will notify agencies of any project under-spending (based on established thresholds).
2. Agencies may provide a verbal explanation or submit a written description of their spending plan for the under-spending project to the Senior Funding Analyst.
  - a. Agencies may also request Technical Assistance (TA) from CARES to improve their spending plan.
3. CARES will review spending plans to determine whether:
  - a. Plans/explanation will resolve the issue.
  - b. TA will improve their spending plan.
4. If a project is unable to explain their spending or develop an adequate spending plan, the Fiscal Advisory Committee will review the situation.
  - a. If the Fiscal Advisory Committee determines the best course of action is fund redirection, the Committee will make this recommendation/s to the Board.
5. The Board (excluding members with a conflict of interest) will consider the Committee's recommendation/s and make final decisions.
  - a. If fund redirection is determined, CARES will immediately contact the impacted agency of the Board's decision.

# ENSURING FAIR & EQUITABLE DISTRIBUTION OF REDIRECTED FUNDS

## POLICIES

CARES (as UFA) and the Board will ensure fair and equitable distribution of redirected funds each contract year by implementing a three-tiered application process including:

- Review Team comprised of individuals, familiar with HUD's CoC program but not active in the CoC, review and score an application developed by the Fiscal Advisory Committee.
- UFA Fiscal Advisory Committee weighs current community need for additional funding with approved agencies and makes funding recommendation/s to the Board; and
- Final decision/s by the Board via majority vote, excluding members whose agencies are under consideration to receive redirected funding (i.e., they must abstain from voting).
- Agencies that give up funds to be redirected still are responsible for reporting on the funds until another agency recaptures them. The agency will still receive a new voucher with reduced funds to reflect the redirect, but with a note of how much redirect has been taken on by other agencies and what is left on the original agency's books.
  - If an agency redirects funds late in the grant year for two or more consecutive years, after being reviewed and receiving technical assistance, it could negatively affect their Rank and Review scores.

## PROCEDURES

### APPLICATION PROCESS FOR REDIRECTED FUNDS

1. Once per year, eligible Agencies must submit a Redirected Funding Application (provided during the grant year by CARES) to the Senior Funding Analyst per specified deadline to be eligible for redirected funds. (Note: if an agency thinks they might need or want redirected funds, they should put in a redirect application. Agencies can always say no to additional funds if the opportunity is presented to them.)
  - a. Senior Funding Analyst verifies application is complete and forwards to the Review Team selected by the Operations Committee each year
2. Review Team scores applications and may conduct interviews with applicants.
3. Application scores, ranking of projects per scores, as well as pertinent spending reports are sent to the Senior Funding Analyst and presented by the Planning Associate to the Fiscal Advisory Committee for review and recommendation to the Board.
4. A CARES representative shares the Fiscal Advisory Committee's recommendations with the Board, in addition to application scores and ranking, the quarterly spending report, and the total amount of unspent funds available for transfer.

5. The Board (excluding members whose agencies have either given up funds or applied for redirected funds) make final decision on which project/s will receive redirected funds when they become available during the grant year.
  - a. If a Request for Redirected Funds cannot be awarded in full, the request will remain on file for the Board to consider if additional funds become available.

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#### CONTRACT PROCESS FOR REDIRECTED FUNDS

1. CARES will execute a subaward amendment to reflect the approved redirected funding.
  - a. If the subaward amendment is for a CoC funded renewal project, reimbursable expenses are allowed from the beginning of the grant year.
  - b. If the subaward amendment is for a newly created project, reimbursable expenses for these amendments are those that occur on or after the date of the fully executed subaward amendment.
2. Agencies receiving redirected funds are responsible for providing 25% match per 24 CFR 578 for both their original award and for the redirected funds, and as detailed in each Subrecipient agreement.
3. The Board may retract funding awarded under the redirecting process if the prequalified agency is unable to spend the available funds during the current grant year.

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#### ADDITIONAL NOTES REGARDING REDIRECTED FUNDS

- Redirected funds received will not be renewed the following contract year.
- Releasing project funding for purposes of redirection is a singular event and will not impact future NOFA application requests.

# V. PROJECT MONITORING

This section outlines Unified Funding Agency (UFA) Program procedures for monitoring subrecipients and for managing high-risk agencies and poor performers.

FINAL

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# ANNUAL MONITORING OF SUBRECIPIENTS

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## POLICIES

In compliance with the CoC Interim Rule, CARES conducts monitoring of subrecipients on an annual basis. Monitoring will include:

1. A minimum of one programmatic monitoring and one fiscal monitoring per grant year.
2. Semi-annual HMIS Data Quality Memos and APR review for each CoC-funded project

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## PROGRAMMATIC REVIEW PROCESSES

To ensure program compliance, the CoC requires subrecipients to actively participate in data and program utilization reviews with the Operations Committee and Collaborative Applicant (CA).

With the assistance of the CA, the Operations Committee develops the programmatic monitoring tool each year. The Board maintains oversight of the process and receives monthly updates of monitoring visits and outcomes.

The CARES' Compliance Officer conducts project monitoring, which includes a review of program files. A summary of the monitoring (including any findings and/or recommendations for improvements) will be maintained by CARES and subject to review by HUD.

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# ANNUAL FISCAL AUDIT OF SUBRECIPIENTS

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## ANNUAL MONITORING

Agencies will be monitored at least annually regarding the financial details of their CoC-funded projects, including back up for at least one submitted voucher. During this process, random sampling will be used whenever possible.

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## SOURCE DOCUMENTATION

Source documentation will be reviewed during annual fiscal monitoring.

Acceptable: Invoices, receipts, payroll records, contracts, time sheets, and banking records including cancelled checks. Mileage reimbursements (with adequate detail) are eligible at the federally approved rate.

Not Acceptable: Intra-agency billings (documentation created by an agency for internal use).

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## POLICIES

CARES (as UFA) must conduct a fiscal audit annually of all CoC-funded agencies to verify subrecipients are compliant with record-keeping protocols and accounting standards.

Fiscal audits at each CoC-funded agency includes reviewing:

1. A sample of CoC program files made available electronically to CARES.
2. Source documentation for paid vouchers.
3. The agency's managerial and financial controls for CoC funded program(s).

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## SUBRECIPIENT FISCAL AUDIT PROCESS

CARES' Finance Team will conduct a review of subrecipient spending and record-keeping (of CoC funding) to verify:

1. Adequate separation of duties for financial transactions.
2. Grant funds are individually tracked on a general ledger.
3. Accounting records reflect the source and use of all funds.
4. Accounting records track match.
5. Back-up documentation related to vouchers submitted to date (in the current contract term) are complete and accurate.
6. If staff wages are charged to more than one funding source, that there are timecards and/or time certifications to support the amounts charged to the grant.
7. Costs charged to the grant all eligible under the program.

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## SINGLE AUDIT MONITORING

CARES will review any findings from subrecipient audits during fiscal monitoring and inquire if findings were resolved or if a plan is in place to resolve them.

If there has been no action to resolve any findings, CARES will work with HUD to determine if the subrecipient should continue to receive funding.

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## ONGOING FISCAL MONITORING

CARES will review project expenditures during the monthly vouchering process.

Review of vouchers will be performed by the Senior Funding Analyst and Finance Team, to ensure:

- The project's budget items and activities are eligible based on the subrecipient agreement; and
- All costs are reasonable.

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# MANAGING HIGH-RISK SUBRECIPIENT AGENCIES/PROJECTS

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## INITIAL ACTION PLAN FOR HIGH-RISK PROJECTS

High-risk projects will be identified by one or more of the following characteristics:

- Projects not currently practicing adequate fiscal management
- Projects with history of expending funds on ineligible activities
- Projects with history of not expending awarded funds per contract details

CARES (as UFA) will work with high-risk projects by:

- Creating an action plan
- Determining a method to track progress
- Conducting regularly scheduled follow-up reviews
- Providing technical assistance (TA) by the Collaborative Applicant, as necessary

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## CONSISTENT POOR PERFORMERS

After an agreed-upon action plan is enacted, high-risk projects demonstrating no progress or remediation over the course of two (2) consecutive quarters are considered consistent poor performers.

If such projects are not flagged for reallocation during the next NOFA cycle, the project will have an additional quarter to demonstrate progress on their action plan. Otherwise, continued poor performance may result in redirecting of funds and/or significant amendments to the existing contract at the discretion of the Continuum of Care Board.

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## ADDRESSING HIGH-RISK AGENCIES / CONSISTENT POOR PERFORMERS

If a project consistently underperforms, it may be flagged for reallocation consideration.

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## ANNUAL GRANT CLOSEOUT POLICY & PROCEDURE

At the close of each contract year, the Subrecipient will provide certification via a *Grant Closeout Form* (see [Appendix H](#)) that the grant has been performed according to the terms and conditions of the executed Subrecipient Agreement, and that no known outstanding programmatic or financial issues exist.

FINAL

## VI. APPENDICES

FINAL

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## APPENDIX A: GLOSSARY OF COMMONLY USED TERMS

**2CFR200:** Uniform administrative requirements, cost principles and audit requirements for federal awards

**Budget Amendment:** a shift in funds from one budget line to another in excess of or equal to 10% of the original HUD approved UFA budget. This only applies to renewal projects; new projects are not allowed amendments.

**Budget Modification:** a shift in funds from one budget line to another less than 10% of the original HUD approved UFA budget for the grant year. New projects are eligible for modifications.

**CARES:** CARES of NY, Inc.

**CA:** Collaborative Applicant

**Compliance:** Following all requirements within the CoC Program Interim Rule.

**CoC Interim Rule** provides that the Continuum of Care must abide by certain operational requirements. These requirements will ensure the effective management of the Continuum of Care process and ensure that the process is inclusive and fair.

Section 578.7(6) requires the CoC to monitor project performance, evaluate outcomes (for both CoC and ESG funded programs) and take action against poor performers.

Section 578.7(7) requires the CoC to evaluate ESG and CoC project outcomes and report to HUD. The Operations Committee, alongside the Systems Committee, will consider how project level performance contributes to system level performance.

**Continuum of Care (CoC):** A network of organizations designated by HUD to oversee homeless assistance grants in a particular geographic area. Each CoC coordinates with homeless assistance agencies in its area to develop annual plans identifying the needs of local homeless populations, the resources currently available in the community to address those needs, and any gaps in resources that could be filled with additional funding.

**Continuum of Care Program:** The HUD Continuum of Care (CoC) Program is designed to promote community-wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

**HUD:** U.S. Department of Housing and Urban Development

**Match:** The amount of cash or in-kind contributions an agency or program is required to contribute to the CoC Program. The amount required for HUD CoC grants is 25%.

**Overhead/Agency Administrative (Indirect) Costs:** Costs supporting the entire agency and not directly related to a particular project.

**Program Administrative Costs:** Costs incurred for the management, oversight, coordination, monitoring and evaluation of a specific project.

**Program Costs:** Costs that are directly related to project activities.

**Renting Up:** Per signed contracts, CoC projects receive a specified dollar amount (Rental Assistance) to provide (at least) an agreed upon number of affordable housing units to (at least) an agreed upon number of individuals experiencing homelessness each contract year. In turn, clients/tenants agree (via housing agreements) to contribute 30% of household income. Based on this formula, projects may forecast excess monthly dollar amounts to fund more units/clients. Certain events (e.g., client's income increases/decreases, client exits program) also impact rent paid out each month – thus 'freeing up' funds for use by another client/s.

**Source Documentation:** The original record containing details to authenticate each transaction as it is entered into the accounting system.

## APPENDIX B: UNIFIED FUNDING AGENCY CONTACT INFORMATION

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### ADDRESS

CARES of NY, Inc.

200 Henry Johnson Blvd, Suite 4

Albany, NY 12210

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### CONTACTS

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Kirstin Jones, Director of Grants and Operations

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Finance Team

[Accounting@caresny.org](mailto:Accounting@caresny.org)

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## APPENDIX C: CoC-FUNDED PROJECT DESCRIPTIONS

### **Jefferson County DSS CE Renewal Combined (2021)**

This project is the combined expansion/renewal of the awarded SSO DV Coordinated Entry Project. JCDSS subcontracts with the Victims Assistance Center (VAC) to provide a DV Coordinated Entry Manager for the entire CoC.

VAC already serves all DV including DV homeless in Jefferson County along with a limited number of homeless that aren't DV and they are looking for ways to provide additional housing assistance to ensure better outcomes for both populations. VAC programs and staff have the necessary supports and experience in serving the DV and homeless populations to ensure that policies/procedures implemented as part of coordinated entry are done in a way that will ensure the DV population can safely be included. Staff at VAC include advocates and social workers with specialized training and experience working with the DV and homeless throughout our County. The HUD/CoC funded housing programs are set up to address the particular needs of the homeless populations and bringing in a VAC employee as the CE Lead will allow the Coordinated Entry system to ensure that policies and procedures implemented will be tailored towards the vulnerabilities of trauma survivors and will place priority on ensuring the feelings of safety, choice and control for the consumers throughout the process. We feel that the specific focus towards providing victim centered approaches will be best practice for all programs using the Coordinated Entry system--all of the homeless consumers we see have some type of trauma and usually victimization as well. The trauma informed training and real-world experience that the DV CE Coordinator will have will be beneficial to all individuals going through the CE process along with providing a resource for all agencies working directly with individuals to move them into housing. This position also serves as the lead for monthly CE SPOA meetings that involve all of our providers and programs throughout the CoC and would provide outreach to programs with available beds as well as agencies working with homeless clients through CE. The VAC CE manager will also work to improve trauma informed principals and trainings for other agency staff working with homeless individuals.

### **Jefferson County DSS CE Expansion (2021)**

This expansion of our SSO-CE project provides 2 additional staff members for CE. This expansion does not impact eligibility and housing first would still apply for all of the housing programs funded through the CoC, additional staff to assist those on the list would improve/expedite housing opportunities with programs. Having staff available not only to assess and track data but to also assist households with referrals, connection with landlords and various program paperwork will significantly strengthen our CE and put us in a much more proactive position for transitioning households from homeless to stable with a variety of programs.

JCDSS subcontracts with the Victims Assistance Center (VAC) to provide a DV Coordinated Entry Manager for the entire CoC. VAC already serves all DV including DV homeless in Jefferson County along with a limited number of homeless that aren't DV and they are looking for ways to

provide additional housing assistance to ensure better outcomes for both populations. VAC programs and staff have the necessary supports and experience in serving the DV and homeless populations to ensure that policies/procedures implemented as part of coordinated entry are done in a way that will ensure the DV population can safely be included. Staff at VAC include advocates and social workers with specialized training and experience working with the DV and homeless throughout our County. The HUD/CoC funded housing programs are set up to address the particular needs of the homeless populations and bringing in a VAC employee as the CE Lead will allow the Coordinated Entry system to ensure that policies and procedures implemented will be tailored towards the vulnerabilities of trauma survivors and will place priority on ensuring the feelings of safety, choice and control for the consumers throughout the process. We feel that the specific focus towards providing victim centered approaches will be best practice for all programs using the Coordinated Entry system--all of the homeless consumers we see have some type of trauma and usually victimization as well. The trauma informed training and real-world experience that the DV CE Coordinator will have will be beneficial to all individuals going through the CE process along with providing a resource for all agencies working directly with individuals to move them into housing. This position also serves as the lead for monthly CE SPOA meetings that involve all of our providers and programs throughout the CoC and would provide outreach to programs with available beds as well as agencies working with homeless clients through CE. The VAC CE manager will also work to improve trauma informed principals and trainings for other agency staff working with homeless individuals.

#### **Jefferson County DSS S Plus C Chronic (2021)**

JCDSS as the major provider of homeless services and benefits to the community is requesting this assistance to continue to assist 9 chronically homeless disabled individuals and families with mental and or substance abuse issues. These individuals and families will be prioritized in the following order: 1. The longest history of homelessness and with the most severe needs. 2. The longest history of homelessness. 3. The most severe service needs. 4. Those with a disability such as mental illness or substance abuse issues. The Housing First model approach is used to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry. Our in-house case manager is able to assist homeless individuals and families move into permanent housing quickly, obtain case management services, treatment, and counseling. The inhouse case manager assists applicants in gathering documentation to meet this program and mainstream benefit eligibility. JCDSS accepts housing referrals from the PNCoC Coordinated Entry Website and from agencies that are not part of the PNCoC coordinated entry website. JCDSS enters data into the PNCoC Coordinated Website for those referrals from agencies that are not part of the PNCoC Coordinated Website to capture homeless data for the PNCoC. JCDSS will determine eligibility, specifically verifying homelessness; episodes and durations and disability. JCDSS will work closely in educating individuals and families' case managers regarding grant guidelines, including required monthly log submission to JCDSS. To achieve increased income and earnings, all participants are screened for mainstream benefits and those that are employable are referred to onsite employment assistance and training. Supportive services are proactively offered to help tenants achieve and maintain housing stability.

Lewis County Opportunities (LCO) Inc. will inspect the units to ensure they meet HUD Housing Quality Standards and manage the rental subsidy. A number of clients have utilized the Section 8 wait-list, transitioning without interruption in getting subsidy.

### **Jefferson County DSS S Plus C Transitional (2021)**

community is requesting this assistance to continue to assist 61 disabled homeless individuals/families with mental and or substance abuse issues. Six (6) of the 61 beds will be dedicated to the chronically homeless and the remaining 55 beds prioritized to the chronically homeless. These individuals and families will be prioritized in the following order: 1. The longest history of homelessness and with the most severe service needs. 2. The longest history of homelessness. 3. The most severe service needs. 4. Those with a disability such as mental health or substance abuse issues. The Housing First approach is used to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry. Our in-house case manager is able to assist homeless individuals and families move into permanent housing quickly, obtain case management, treatment, counseling and assist in gathering documentation to meet eligibility for this program and mainstream benefits. JCDSS accepts housing referrals from the PNCoC Coordinated Entry Website and from agencies that are not part of the PNCoC Coordinated Entry Website. JCDSS will submit data into the PNCoC Coordinated Entry Website for those non-participating agencies to capture homeless data for the PNCoC. JCDSS will determine eligibility, specifically verifying homelessness; episodes and durations and disability. JCDSS will work closely in educating individuals and families' case managers regarding grant guidelines, including required monthly log submission to JCDSS. To achieve increased income and earnings, all participants are screened for mainstream benefits and those that are employable are referred to onsite employment assistance and training. Supportive services are proactively offered to help tenants achieve and maintain housing stability.

Lewis County Opportunities (LCO) Inc. will inspect the units to ensure they meet HUD Housing Quality Standards and manage the rental subsidy. A number of clients have utilized the Section 8 wait-list, transitioning without interruption in getting subsidy.

### **Mental Health Association Jefferson-Peer Run Housing First (2021)**

The Peer Run Housing First Program (PRHF) is a homeless housing program specifically for people with at least one mental health diagnosis. It provides an opportunity for the targeted population to learn skills, set goals and eventually obtain permanent housing. Upon entry, the member (single or families with or without children) is placed in one of our 4 apartments and provided with basic needs. They meet with the PRHF Member Advocate on a daily basis and work towards obtaining permanent housing while learning the necessary tools to maintain income and housing. PRHF supports each member in seeking proper physical and mental care, reaching educational goals, and preparing for employment readiness, resume building and budgeting. The PRHF Program is unique as we cover a variety of needs with a high risk population and Veterans. In addition to the PRHF program, the participant will also have access to the Drop-in/Recovery Center which provides a safe and friendly environment to grow their social networks and join in other activities, such as, wellness groups (cope, parent support (Agape), smoking cessation, reintegration) and recovery center activities.

### **Snowbelt Rapid Rehousing (2021)**

The Rapid Re-housing Program will be designed to quickly transition homeless individuals and/or families into permanent housing. Rapid Re-housing participants must be from Categories 1 and 4 of the homeless definition. The Rapid Re-housing program will serve participants for at least six months with case management and supportive services with a minimum of one case management meeting one time per month.

The STEHP Case Manager will develop an assistance plan tailored to the needs of each assisted individual and/or family which could include landlord negotiation, credit repair, money management, and/or life skills development. STEHP assistance will include rental and other financial assistance, housing location, case management and stabilization services. The STEHP program will connect consumers to resources and services needed to become self-sufficient by the time their assistance ends. This includes access to mainstream benefits as well as employment and training. The desired outcome is for the assisted individuals and/or households to become stably housed and to maintain their housing stability over time.

The administration of the program will be geared to ensuring that these resources are used efficiently. The program will strive to provide just enough assistance to prevent homelessness, or to successfully assist households in becoming stably housed. Proper administration of resources will ensure resources prevent more episodes of homelessness, and assist more households currently experiencing homelessness. Those with extreme housing barriers will be prioritized. The goals of the Rapid Re-housing program are to: 1. Minimize consumer's length of homelessness. 2. Help consumer achieve residential stability. For participants who are unemployed but able to work, the program will attempt to increase the participants' job skill level and income. The population to be served will include persons who suffer from at-risk factors such as mental illness, substance abuse, domestic violence, exiting institutions as well as persons who are experiencing housing crisis. We would expect to assist a total of 10 individuals with financial assistance.

### **Transitional Living Services PSH Chronic Homeless (2021)**

The project provides 8 units of PSH for CH households where the head of household has a disabling condition. The units will be located in Jefferson County, Lewis County, and St. Lawrence County. Prior to the consolidation there were 2 units in Jefferson County, 3 units in Lewis County, and 3 units in St. Lawrence County. The tenant will hold the lease in all cases. The long term rental assistance is indefinite.

The number of CH households identified during the PIT averages out at about 8-10 households per year, although nearly three times that figure were identified in 2013. Persons with disabling conditions, especially chronic ones, often struggle to maintain housing and economic self-sufficiency. Without supports, compliance with medical and behavioral health treatment and medication management may be low.

The project's goals are to achieve stable permanent housing and assist persons to increase or stabilize their income. Participants receive safe housing, case management, advocacy, and linkage to services to achieve their goals and transition from the program. Each household has an individualized case management plan developed with a case manager following a comprehensive assessment of goals and needs with an emphasis on eliminating those barriers

that led to homelessness. If there are needs that are not met by NCTLS, program staff ensure linkages to other community providers. In St. Lawrence, this project complements the existing 44 SRO TH beds that NCTLS operates under contract with the state. In Lewis, this project complements the 7 units of HUD scattered-site leasing TH that NCTLS operates. As a result, NCTLS has already forged strong relationships with anticipated referral sources and providers of supportive services not covered in the project that participants will likely access.

NCTLS is confident that this project will be effective in both increasing the number of beds devoted to the chronically homeless, as well as assisting HUD to meet its core goal of using housing as a platform for improving quality of life.

CoC funding is required so that households who cannot secure safe and appropriate housing in the local market can be quickly housed and stabilized with necessary supportive services provided in order to prevent future instances of homelessness. The project participates in the CoC's Coordinated Entry process, and utilizes a Housing First approach which ensures that participants are not screened out based on having too little or no income, active or historical substance abuse, having a criminal record (with exceptions for state-mandated restrictions) or a history of domestic violence. The project also ensures that participants are not terminated for failure to participate in supportive services, failure to progress on a service plan, loss of income or failure to improve income, being a victim of domestic violence or any other activity not covered in a lease agreement typically found in this area.

### **Transitional Living Services RRH (2021)**

Despite growth in recent years, the number of PH beds in the CoC does not meet the needs of the homeless. There are 214 RRH beds funded through ESG. During the 2016 PIT, they were 100% occupied. On the night of the PIT, 45 children and adults were in emergency housing, 9 adults were unsheltered, and another 65 adults and children were in TH. Unmet need for homeless housing persists. Wait lists of a year or more for non-priority households for HUD vouchers exist, further limiting access to housing. This project, reallocated from the existing TLS TH project, created a RRH project the same size as the TH project, (17 units, 25 beds), yet retains 7 units in the TH project, increasing the total number of available CoC units with no new funding. Tenant-based rental assistance is medium term, up to 24 months.

One quarter of the units are dedicated to veterans. Tenants access the project through the Coordinated Entry System. Tenants receive the same services offered in all TLS HUD projects: safe housing, case management, advocacy, and linkage to services, with an emphasis on eliminating barriers that led to episodes of homelessness. Initially, coordination is achieved through the use of the Coordinated Entry System to identify eligible applicants when there is a program opening. TLS assists applicants to identify safe, appropriate housing to meet the household's needs in their community of choice, providing advocacy as needed with private landlords. After admission, tenant needs are assessed related to the HUD goals of helping participants obtain and remain in permanent housing, helping participants increase skills and/or income and helping participants achieve greater self-determination. A personalized plan for housing support is developed, and it is determined which needed services TLS will provide and which will be obtained through linkages in the community. TLS has well established working relationships with providers of services that we are unable to provide ourselves to affect all necessary linkages in the form of a warm handoff. In the event that an unusual need

should present itself, TLS is committed to find a source to meet that need. The project expects that 70% of exiters will move to another type of permanent housing, and 45% of participants will increase their income from all sources while in the program.

### **Transitional Living Services Scattered Site Gateway Housing (2021)**

The project started May 1, 2013. The program is a scattered site TH model where NCTLS leases units from landlords in Lewis County for an expected program “enrollment” of 12-24 months. Participants receive safe housing, case management, advocacy, and linkage to services to achieve their goals and transition from the program. Each household has an individualized case management plan developed with a case manager following a comprehensive assessment of goals and needs with an emphasis on eliminating those barriers that led to homelessness. There are no population priorities in place for the program – all homeless populations are served. There were no existing TH beds for this population prior to this project. Two family and five adult only households are served. At capacity a total of 9 persons would be served. Referral sources include DSS, NCTLS, primary physicians, landlords, and self-referral. There have been domestic violence survivors, persons with disabling/chronic health conditions, persons with a documented mental health diagnosis and/or a documented chronic substance abuse diagnosis, and veterans. The program has focused more on budgeting and working with consumers on establishing sustainable income. We are utilizing our own in house budgeting education as well as outside sources to teach individuals and families good money habits they can use going forward. Many households need a variety of services and have been linked or referred to mental health, addiction, and/or primary health care services. We also utilize local vocational resources such as Access-VR to help those that can work find employment. We continue to establish relationships with new providers in the area who will benefit our consumers. Our relationships with landlords are very good and proven valuable when helping individuals find permanent housing and/or if we are looking for new units for the program. Our mission continues to be working with individuals and families to establish permanent housing and work with them on their goals to ensure long term success.

CoC funding is required so that households who cannot secure safe and appropriate housing in the local market can be quickly housed and stabilized with necessary supportive services provided in order to prevent future instances of homelessness. The project participates in the CoC’s Coordinated Entry process, and utilizes a Housing First approach which ensures that participants are not screened out based on having too little or no income, active or historical substance abuse, having a criminal record (with exceptions for state-mandated restrictions) or a history of domestic violence. The project also ensures that participants are not terminated for failure to participate in supportive services, failure to progress on a service plan, loss of income or failure to improve income, being a victim of domestic violence or any other activity not covered in a lease agreement typically found in this area.

### **CARES of NY, Inc. Planning Project**

Funding through this project will be used to coordinate the implementation of a housing and service system to prevent and end homelessness within the PNHC CoC. Proposed planning activities fall within three categories: 1) coordination and HUD compliance; 2) project evaluation and monitoring; and 3) CoC application development. Coordination and compliance

activities will focus on facilitating CoC Board selection, scheduling and facilitating Board meetings, ensuring public invitations for CoC Membership meetings, encouraging representation at the Board, Membership and Committee levels that reflect the community served, and facilitating the annual review of CoC By-Laws, as required of CoCs by Subpart B of 24 CFR Part 578. Planning staff will continue to support the CoC in engaging systems partners as noted within the PNHC Strategic Plan to Prevent, Reduce and Combat Homelessness; specifically, stakeholders from the homeless prevention, foster care, criminal justice, health, mental and behavioral health and code enforcement systems, in an effort to improve efficiencies between the systems and reduce entries to homelessness. Planning Staff will review and monitor system performance measures to determine progress in meeting community homelessness needs and identify strategies to improve performance outcomes as a community; and will coordinate and submit the annual PIT and HIC reports. Additional coordination activities to prevent and end homelessness will include professional training and development, as staff will continue to plan and host workshops on topics such as addressing racial inequity in homelessness, Housing First, Trauma-Informed Care, landlord engagement and safety planning for survivors of domestic violence. Activities focused on project evaluation and monitoring will include the review/realignment of CoC program performance targets, system performance measures, and written standards to ensure a systemic response to homelessness. Staff will also coordinate with the CoC to ensure the coordinated entry (CE) system is operating within the parameters of the CE policy and procedure manual. Grant funds will be used to allow staff to work directly with the Operations Committee to monitor and evaluate CoC and ESG programs and provide technical assistance, ensuring each program is meeting or working towards community determined priorities, as required by Subpart B of 24 CFR Part 578. Within activities under the third category, CoC application development, planning funds will be used to coordinate and submit the annual CoC application. Staff will ensure completion of the consolidated application; will work with the Board to establish annual priorities for funding projects; and will work with community stakeholders to ensure a collaborative process for developing, approving, and submitting project applications, as noted in Subpart B of 24 CFR Part 578.

### **CARES of NY, Inc. UFA Project**

The purpose of this project is to complete all duties noted within 24 CFR 578.11. Staff funded through this project will work collaboratively with the Points North CoC Board of Directors and Finance Committee to complete the following tasks: (1) apply to HUD for funding for all CoC projects, (2) enter into grant agreement with HUD and into legally binding contracts with subrecipients which outline required fiscal controls, (3) review and implement annual subrecipient monitoring policies and schedule on-site visits to review fiscal and program controls, and (4) obtain approval from CoC Board in advance of requesting grant amendments from HUD. CARES, in consult with the HUD Regional office, will execute the follow tasks in an accurate and timely manner (1) execute contract agreements with subrecipients (2) draw down HUD funding and reimburse subrecipients after a review and approval of subrecipient vouchers and (3) share administrative funds with all subrecipients. Project staff will ensure subrecipients establish necessary fiscal controls and fund account procedures and will monitor for compliance with CoC Program regulation annually. In addition project staff will submit all

required reports and audits to HUD on time.

### **CARES of NY, Inc. HMIS Project**

The NY-522 CoC HMIS is a participant in the CARES Collaborative Homeless Management Information System operated by CARES or NY, Inc. to ensure an unduplicated count of homeless persons within the jurisdiction.

CARES works with the community to establish goals and needs centered around gaining community support, participation of non-mandated projects and identifying reporting needs, the CARES Regional CoC meetings and uses the data to provide insight into community trends, patterns of service utilization and possible changes in need. CARES also provides comprehensive reporting for use in grant writing and reporting at the agency and community level. Over the last year, CARES has been able to increase data quality in the database significantly, assist current users in more comprehensive use of the software and provide targeted reporting which better assists the community in understanding the homeless and at-risk population and has assisted the community in exploring the use of the HMIS for Coordinated Entry. CARES has also provided support via the HMIS for ESG and CV funded projects and has worked with the RHY, SSVF and State ESG funded projects to ensure complete, secure, and timely collection and transmittal of data. By participating at this level, the HMIS becomes more than a reporting mechanism, but rather is an integral part of community planning and needs assessment.

CARES provides training and technical assistance to the participating agencies, recruits additional agencies, prepares monthly and annual reports, organizes meetings of the HMIS Advisory Committee, reports annually on the LSA, NOFO and System Performance Measures, and manages relations with the HMIS software vendor. CARES leverages community support through partnerships with accredited academic institutions to research data quality and perform community analysis and works closely with the Office of Temporary Disability Assistance in New York State (NYSOTDA) on a data warehouse project which will positively impact CoC through a better understanding of homelessness state-wide and the possible reallocation of Medicaid dollars to housing initiatives.

To ensure compliance with the HUD standards of privacy, security and data quality, CARES also works with the CoC to conduct monitoring visits and provides technical assistance for any deficiencies found. CARES staff perform regular and ongoing data quality reports and actively work closely with agencies to better understand and utilize the HMIS data collection and reporting capabilities for program, agency and community level planning and project performance review. Representatives from CARES have attended each of HUD's annual HMIS Conferences and at least one NHSDC conference annually while the agency closely monitors any changes in the federal regulations governing HMIS.

# APPENDIX D: BUDGET MODIFICATION REQUEST – WITHIN A PROJECT: TEMPLATE

## NY503 UFA: Budget Modification - Transfer Funds Between Lines

Grantee: \_\_\_\_\_  
 Grant/Project: \_\_\_\_\_  
 Grant Number: \_\_\_\_\_

Grant Year: 9/1/2021-8/31/2022  
 Current Budget Version: \_\_\_\_\_

BUDGET LINE	CURRENT APPROVED BUDGET	Modifications		REVISED BUDGET
		DECREASE <small>Show numbers in this column as negative</small>	INCREASE <small>Show numbers in this column as positive</small>	
Leasing	\$ -	\$ -	\$ -	\$ -
Rental Assistance		\$ -	\$ -	\$ -
Support Services		\$ -	\$ -	\$ -
Operating		\$ -	\$ -	\$ -
HMIS		\$ -	\$ -	\$ -
Admin Awarded		\$ -	\$ -	\$ -
<b>Total</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

**Explanation (must include an affirmation that the budget modification will not negatively impact the number of clients you are able to serve with this project):**

Revised Budget to be effective as of date: \_\_\_\_\_ Revised Budget Version: \_\_\_\_\_

\_\_\_\_\_  
 Authorized Agency Signatory (Signature)

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Authorized Agency Signatory (Print Name/Title)

For UFA-Administrating Agency (CARES) use only:		
<input type="checkbox"/> Denied		
<input type="checkbox"/> Approved	_____ Authorized CARES Staff (Signature)	_____ Date
	_____ Authorized CARES Staff (Print Name/Title)	

# APPENDIX E: BUDGET MODIFICATION REQUEST – TRANSFER BETWEEN PROJECTS: TEMPLATE

## NY503 UFA: Budget Modification - Transfer Funds Between Projects

Grantee: AGENCY NAME

Grant Dates: 9/1/2021-8/31/2022

Grant/Project #1: PROJECT NAME/TITLE

Current Budget Version:

Grant Number: NY000000000X

Budget Effective Date:

BUDGET LINE	PROJECT 1 CURRENT APPROVED BUDGET	Modifications		REVISED BUDGET
		DECREASE IN BUDGET <small>Show numbers in this column as a negative</small>		
Leasing	\$ -	\$ -		\$ -
Rental Assistance	\$ -	\$ -		\$ -
Support Services	\$ -	\$ -		\$ -
Operating	\$ -	\$ -		\$ -
HMIS	\$ -	\$ -		\$ -
Admin Awarded	\$ -	\$ -		\$ -
<b>Total</b>	<b>\$ -</b>	<b>\$ -</b>		<b>\$ -</b>

Grant/Project #2:

Current Budget Version:

Grant Number: NY000000000X

Budget Effective Date:

BUDGET LINE	PROJECT 2 CURRENT APPROVED BUDGET	Modifications		REVISED BUDGET
		INCREASE IN BUDGET <small>Show numbers in this column as a positive</small>		
Leasing	\$ -	\$ -		\$ -
Rental Assistance	\$ -	\$ -		\$ -
Support Services	\$ -	\$ -		\$ -
Operating	\$ -	\$ -		\$ -
HMIS	\$ -	\$ -		\$ -
Admin Awarded	\$ -	\$ -		\$ -
<b>Total</b>	<b>\$ -</b>	<b>\$ -</b>		<b>\$ -</b>

Explanation (must include an affirmation that the budget modification will not negatively impact the number of clients you are able to serve with this project):

Revised Budgets to be effective as of date: \_\_\_\_\_

Project #1 Revised Budget Version: \_\_\_\_\_

Project #2 Revised Budget Version: \_\_\_\_\_

Authorized Agency Signatory (Signature) \_\_\_\_\_

Date \_\_\_\_\_

Authorized Agency Signatory (Print Name/Title) \_\_\_\_\_

For UFA-Administrating Agency (CARES) use only:	
<input type="checkbox"/> Denied	
<input type="checkbox"/> Approved	<div style="display: flex; justify-content: space-between;"> <div>Authorized CARES Staff (Signature) _____</div> <div>Date _____</div> </div> <div style="margin-top: 5px;">Authorized CARES Staff (Print Name/Title) _____</div>

# APPENDIX F: VOUCHER TEMPLATE

## Voucher

**CLAIM PERIOD: MMM-YY**

Grant Number: NY000XXXXXX

Grant Start Date: 9/1/2019

Current Budget Version: Original

Grantee: AGENCY NAME

Grant End Date: 8/31/2020

Effective Date: Effective date for version

Project: PROJECT NAME/TITLE

*Approved budget modifications will be reflected in this column.*

BUDGET LINE	CURRENT APPROVED BUDGET	CUMULATIVE REIMBURSEMENTS TO DATE	[CURRENT PERIOD] EXPENSES BEING CLAIMED	[PENDING] CUMULATIVE REIMBURSEMENTS	[PENDING] BUDGET BALANCE
Leasing	\$ -	\$ -	\$ -	\$ -	\$ -
Rental Assistance	\$ -	\$ -	\$ -	\$ -	\$ -
Support Services	\$ -	\$ -	\$ -	\$ -	\$ -
Operating	\$ -	\$ -	\$ -	\$ -	\$ -
HMIS	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Awarded	\$ -	\$ -	\$ -	\$ -	\$ -
<b>TOTAL</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

*The undersigned certifies that the expenditures shown above are related to the project identified; are just, true and correct, and have been duly authorized; and that all expenditures have been made in accordance with the approved project proposal. Documentation should be maintained by the agency to support these costs.*

Authorized Agency Signatory (Print Name) \_\_\_\_\_ Authorized Agency Signatory (Signature) \_\_\_\_\_ Date \_\_\_\_\_

For UFA-Adminstrating Agency (CARES) use only:	<input type="checkbox"/> Denied	CARES Staff Signature _____	Date _____
	<input type="checkbox"/> Approved		

# APPENDIX G: CREDIT AUTHORIZATION FORM

## UFA Subrecipient Direct Credit Authorization

Subrecipients must sign this form to receive funds from the United Funding Agency (UFA).

Please attach a voided check for the account you would like funds transferred to in addition to filling out the form.

**Bank Routing Number (ABA Number):** \_\_\_\_\_

**Account Number:** \_\_\_\_\_

**Authorization:**

This agreement authorizes CARES of NY, Inc. to send credit entries electronically or by any other commercially accepted method, to the account indicated and to other accounts we identify in the future (the "Account"). This authorizes the financial institution holding the Account to post all such entries. I agree that the ACH transactions authorized herein shall comply with all applicable U.S. Law. This authorization will be in effect until CARES of NY, Inc. receives a written termination notice from the Subrecipient and has a reasonable opportunity to act on it.

\_\_\_\_\_  
**Printed Name**

\_\_\_\_\_  
**Organization**

\_\_\_\_\_  
**Authorized Signature**

\_\_\_\_\_  
**Date**

## APPENDIX H: ANNUAL GRANT CLOSEOUT CERTIFICATION FORM

Subrecipient: <b>AGENCY</b>
Program Name(s): <b>ENTER ALL PROGRAMS HERE</b>
Grant Number: <b>ENTER ALL GRANT NUMBERS APPLICABLE TO GRANT</b>
Grant Expiration Date: <b>9/30/xxxx</b>

Description	Amount
Total Grant Amount Authorized	\$
Grant Funds Disbursed	\$
Closeout costs or contingent liabilities to be paid with grant funds after the closeout agreement is signed	\$
Unused grant funds to be returned to UFA	\$
Redirected funds received over and above the contracted amount	\$
Program income on deposit in financial institutions at the time the closeout agreement is signed	\$

CARES of NY, Inc. (CARES) agrees to close out the above referenced grant, subject to the Recipient's certifications and obligations under this Grant Closeout Agreement.

The Subrecipient certifies that:

- (1) The grant has been performed in accordance with the terms and conditions of the executed Grant Agreement, including any Grant Agreement Amendments, the McKinney-Vento Homeless Assistance Act (42 USC 11301 et seq.), the Continuum of Care Program regulation at 24 CFR part 578, and the Subrecipient's approved application.
- (2) There are no known outstanding programmatic or financial issues; and
- (3) All data provided in the table accurately reflects the exact amounts as shown in the subrecipient's financial system.

The Subrecipient agrees to comply with applicable requirements and continuing responsibilities identified in the Continuum of Care Program regulation at 24 CFR part 578, including the program income requirements at 24 CFR 578.97 and the recordkeeping requirements at 24 CFR 578.103. The Subrecipient also agrees to comply with applicable requirements and continuing responsibilities in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR Part 200, including the Post-Closeout Adjustment and Continuing Responsibilities at 2 CFR part 200, subpart F, except where inconsistent with the McKinney-Vento Homeless Assistance Act or the Continuum of Care Program regulations at 24 CFR part 578, in which case the provisions of the McKinney-Vento Homeless Assistance Act and Continuum of Care Program regulations govern. These requirements and continuing responsibilities include those related to the management and disposition of property purchased with Federal funds, retention of and access to records, disallowances of grant payments, and collection of amounts due after closeout. The Subrecipient agrees, if applicable, that any costs

paid with funds under this grant that were not audited previously shall be subject to coverage in the recipient's next single audit, performed in accordance with Single Audit Requirements (2 CFR Part 200 Subpart F). The Subrecipient acknowledges that it may be required to pay back the UFA any disallowed costs based on the results of an UFA/HUD audit, or upon additional UFA/HUD reviews.

CARES as UFA or HUD reserves the right to conduct future monitoring of projects funded under this grant, either onsite or by review of information, or copies of documents requested from the Subrecipient. The Subrecipient acknowledges that a finding of non-compliance resulting from such review and failure to take appropriate corrective actions satisfactory to CARES and HUD may be considered as evidence of unsatisfactory performance, in consideration of future grant awards.

Subrecipients that received grant funds for new construction, acquisition, or rehabilitation are required by law to continue for a specified period to operate the housing or provide supportive services in accordance with the requirements of the program under which the grant funds for new construction, acquisition, or rehabilitation were originally awarded. The housing or supportive services provided by recipients of grants originally awarded under the Supportive Housing Program must continue to comply with the requirements of 24 CFR part 583 for a period of 20 years from the date of initial occupancy or date of initial service provision, even if the grant was subsequently renewed in the CoC program. The housing or supportive services provided by recipients of grants awarded under the Continuum of Care Program must continue to comply with the requirements of 24 CFR part 578 for a period of 15 years from the date of initial occupancy or date of initial service provision.

Yes  No

This Grant Closeout Agreement incorporates the attached special conditions.

\_\_\_\_\_  
Agency Representative Signature      Date

\_\_\_\_\_  
CARES of NY, Inc. Signature      Date

\_\_\_\_\_  
Printed Name of Authorized Representative

\_\_\_\_\_  
CARES of NY, Inc. Representative

\_\_\_\_\_  
Title

\_\_\_\_\_  
Title

FINAL