

# UNIFIED FUNDING AGENCY (UFA)

## STANDARD OPERATING PROCEDURES

Version Six

CONTINUUM OF CARE NY-503

CARES of NY, Inc.

Albany County Coalition on Homelessness (ACCH)



V6|Effective 12/1/2023

***Notes about the Unified Funding Agency Standard Operating Procedures Version Six:***

Major changes made to the Standard Operating Procedures include:

1. [Pages 11 & 18](#): Specified Board must approve eLOCCS changes over \$25,000 per Budget Line Item.
2. [Page 13](#): Edited details regarding CARES' staff roles in financial transactions.
3. [Pages 15 & 17](#): Changed match review to occur at grant close-out rather than during monitoring.
4. [Page 20](#): Updated voucher policy to submit two vouchers versus four (unless deemed High-Risk).
5. [Page 22](#): Added subrecipient's obligation to notify CARES of erroneous claims and supply documentation for corrections.
6. [Page 24](#): Updated expenditure timeline. Changed consideration of redirecting funds from 60 days after contract to 30 days.
7. [Page 27](#): Added Review Team instructions for non-competitive Redirect Applications.
8. [Pages 26 & 28](#): Added that Rank and Review score may be impacted by consistently releasing funds for redirect year after year.
9. [Page 33](#): Expanded High-Risk section to include:
  - a. Subrecipient Risk Assessment Tool ([Appendix J](#))
  - b. High-Risk Voucher Review Schedule ([Appendix K](#))
10. [Page 34](#): Added close-out requirements from prior term must be finalized before any new/current term vouchers are processed.
11. [Pages 49-50](#): Replaced monthly vouchering recommendation with voucher submission schedule requirement.
12. [Page 55](#): Updated *Grant Close-Out Form* to include match review.

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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 Albany County Coalition on Homelessness.

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 with 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 (CoC) 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 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 Albany County Coalition on Homelessness**

Due to the strength of the Albany County Coalition on Homelessness (ACCH) and the Collaborative Applicant (CARES of NY, Inc.) in the NY-503 Albany City & County Continuum of Care (“the CoC”), CARES of NY, Inc. (CARES) became the sixth UFA designate in the country during the 2017 CoC Program competition.

Specific strengths of the ACCH 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 September 1<sup>st</sup> – August 31<sup>st</sup>.

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### **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](#)).

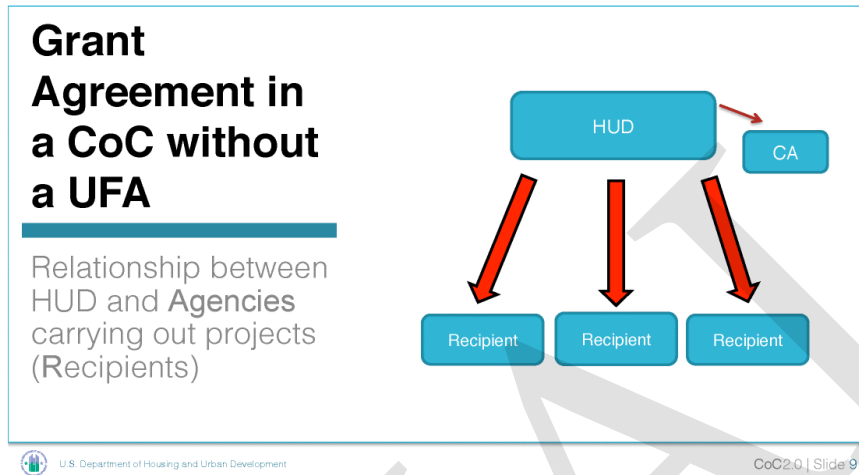
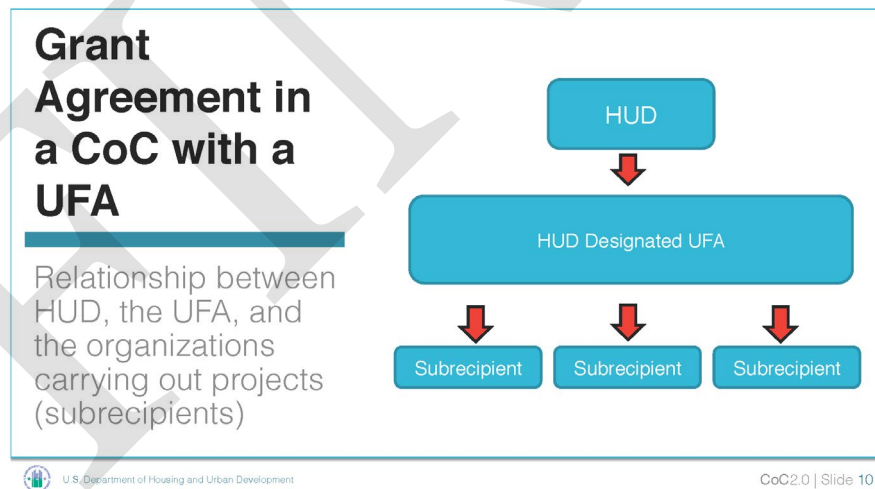


Figure 2 depicts the grant administration process for a Continuum **with** UFA designation, wherein the UFA is the direct HUD grantee and maintains annual subrecipient agreements with each CoC-funded agency ([HUD UFA Webinar](#)). The Collaborative Applicant becomes the UFA.



## 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-503 Albany City & County Continuum of Care (ACCH) 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 that apply through the annual application process.
  - Agencies can only be added to the UFA through the annual NOFO process.
- 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 ACCH 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.
  - Conducts financial review of new agencies added to the UFA through the NOFO process.
- 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).
- Tracks project spending to identify potential unspent funds available for repurposing during the UFA-designated contract year.
- Notifies the Fiscal 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.
- Obtains Board approval to add new projects from existing UFA-funded agencies; 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).
- 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 Fiscal 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 FY22 CoC-Funded Projects.

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## **ALBANY COUNTY COALITION ON HOMELESSNESS (ACCH)**

In collaboration with HUD, the Albany County Coalition on Homelessness (ACCH) / NY-503 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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## **ACCH BOARD**

The ACCH Board remains responsible for:

- Reviewing and providing feedback on fiscal policies and procedures.
- Reviewing and approving the Standard Operating Procedures (SOP).
- Reviewing and approving changes in eLOCCS over \$25,000 per Budget Line Item (BLI) request;
- Reviewing reports of Budget Movements under \$25,000 per BLI request on a monthly or bi-monthly basis; and
- Providing final approval on projects that have requested redirected CoC funds through the process outlined in this SOP.

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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.
- Review and provide comments on the Redirected Funds Application.
- Bi-monthly review of project spending, budget modifications and amendments for possible redirecting of funds; and
- Review fiscal monitoring summary of the CoC.

# 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

## 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.

## CARES UFA FUNDING ANALYST

The UFA 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 for review and approval for LOCCS drawdown.
- Maintaining copies of all approved vouchers in a secure, digital folder for at least seven years after grant close-out.
- Tracking grant spending.
- Monitoring 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 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 Contracts 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.
- Create contracts and addendums for awarded redirected funds.

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## **DIRECTOR OF GRANTS AND CONTRACTS**

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

- Maintaining copies of all active grant documentation.
- Maintaining active eLOCCS authorized user status.
- Resolving any error messages received by the eLOCCS system.
- Once funds are received from HUD, enter approved ACH transactions to initiate wire transfer to subrecipients.
- Notify UFA Funding Analyst and Finance Team of subrecipient payments.
- Review budget modifications for accuracy with contract.

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## **FINANCE TEAM**

The CARES Finance Team is responsible for:

- Review of the accuracy of voucher totals and eLOCCS totals.
- Entering Finance Team approved amount of funds from vouchers into eLOCCS.
- Submitting approved eLOCCS drawdown and ACH summary (monthly) to Director of Grants and Contracts.
- 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 to track real time spending).
- Maintaining appropriate source documentation for vouchers, as noted in the Vouchering Policy.

- Determining project match and securing documentation of source and use and maintaining on file for review during close-out.
- Providing a letter of commitment to provide 25% match per project budget (excluding Leasing) to the UFA for upload into the annual CoC funding application.
- Confirming program income is spent before requesting grant funds. Vouchers will include a section to document the receipt of program income and amounts.
- 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 in accordance with the selected *Voucher Submission Schedule* (see [Appendix D](#) for schedule)
- 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 Assistance Listing Number (ALN/CFDA) within the financial documents 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 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.

## 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 subaward agreement, 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 ensure that CARES has a fully executed copy of that 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, verify active UEI ID, verify registration via SAM.gov, 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 in accordance with the match policy detailed below.
  - CARES will research 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 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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### SUBRECIPIENT MATCH POLICY

CARES collects match documentation to maintain compliance with the requirements in § 578.73 and § 200.306.

- At the beginning of each grant year, agencies must submit a signed and dated commitment letter on agency letterhead to include at least the following:
  1. Sources of match
  2. Amount of cash/donation value
  3. Date cash/goods will be received, and length of time donation is available
  4. Applicable grant and fiscal year
  5. Eligible activities to be funded by cash/provided by in-kind donation

- When applicable, a Memorandum of Understanding (MOU) must be executed before in-kind services may count as match.
- Agencies are encouraged to send updated match letters to CARES if sources, dates, activities, or amounts change throughout the grant year.
  - CARES has added an optional Match Tab on each voucher for agencies to track match expenditures or changes.
- In preparation for review of match, subrecipients should document any costs paid for with cash match or donated via in-kind match during the grant year.
  - Match may be only spent on the eligible activities listed in 24 CFR 578. CARES will review match at grant close-out by requesting the applicable source documents.
- CARES will store this match evidence in a secure, digital folder for seven years to provide it to HUD upon request.
- As documented within the subrecipient contract in Section III, match must be spent and tracked throughout the grant year, or the project can be considered noncompliant and subcontract processes may be enforced.

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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 NOFO 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

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; except for moving funds between renewal and new projects. This exception is due to HUD funding policies, which currently prohibit moving funds between new and renewal grants.

ACCH Board approval is required for CARES (as UFA) to move funds via a Budget Modification that will change a budget line item (BLI) amount in eLOCCS:

- If the amount shifting between BLIs is over \$25,000 per request
- 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, in which case, please see SOP section regarding Redirection.*

Any permanent changes in targeted subpopulations, a permanent decrease in number of units, or reduction of a single budget line of 10% or more of the total UFA original budget within the 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 to CARES a *Budget Modification Request – Within a Project* (see [Appendix E](#) for template) OR a *Budget Modification Request – Transfer Between Projects* (see [Appendix F](#) 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 encouraged to limit budget modifications per project per year and may request budget modifications during the contract year by the 15<sup>th</sup> of December, March, June, August, and September. (Redirected funds do not count toward this limit.)
  - a. Budget modification requests received after the grant term ends are subject to HUD approval.

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## **BUDGET AMENDMENT REQUEST PROCEDURE**

To make any permanent changes to targeted subpopulations, number of units served, or monetary reductions of a single budget line of 10% or more 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 E](#) for a modification within a project or [Appendix F](#) 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, as applicable.
4. CARES (as UFA) will provide the ACCH 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 UFA 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.
    - i. The addendum must be signed for the agency to voucher against the new budget.

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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 containing all expenditures to date for the project since the last voucher submitted.

Within the grant year, at least two vouchers per program are required by HUD to be submitted with source documentation to justify costs. This requirement is subject to change per HUD Field Office guidance.

*If a program is deemed high-risk, additional source documentation may be required according to the High-Risk Voucher Review Schedule ([Appendix K](#)).*

Agencies may submit vouchers at any time, but only properly completed vouchers submitted by the established deadline will receive reimbursement. **Note:** CARES (as UFA) will not complete or edit any vouchers on behalf of subrecipients.

Voucher review will occur on a weekly basis.

Agencies must notify CARES immediately upon discovery of erroneous drawdown amount/s and supply documentation to support correction in e-LOCCS.

If vouchers are approved, requested funds will be received by agencies within ten (10) business days. **Note:** ACH timing is at the discretion of the financial institution.

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. However, if an agency's project is a recipient of redirected funds, the grant budget will be modified to reflect this new amount and the agency can be reimbursed up to this additional amount of the new redirected funds. Similarly, if an agency gives redirected funds to CoC, that agency's budget will be modified to reflect the decrease in the budget and will only be reimbursed up to the new grant budget amount.

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## VOUCHER SOURCE DOCUMENTATION

Voucher backup should be clearly labeled and submitted to document costs claimed per budget line. Suggested evidence includes, but is not limited to:

- Personnel Services: Time sheets, payroll journal, time & effort reporting, applicable time study
  - Fringe and administrative ledgers may be submitted to show categories and amount.
- Rental Assistance, Leasing, and Security Deposits: Copy of the signed occupancy agreement or lease/sublease for each client to be submitted, again at renewal if rent amount changes, or when a new client enters the program in accordance with § 578.77(a)
- Operating and Non-Personnel Costs: Invoices or receipts for goods and/or services that are not related to staff time or fringe.
- Other Expenses: CARES will assist subrecipients to identify appropriate backup.

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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 G](#) to view the voucher template.)

1. At the start of each fiscal year, CARES UFA 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 [ALBANYUFA@CARESNY.ORG](mailto:ALBANYUFA@CARESNY.ORG) no later than 10:00am the Thursday of each week.
  - a. If Thursday falls on a CARES recognized holiday, the deadline will extend to noon the following business day.
  - b. Any unusual circumstances which may delay voucher submission (e.g., staff illness, facility emergency) must be communicated to the UFA Funding Analyst.
3. Vouchers received after the deadline will be processed the following week.
4. If source documentation is sent, Personally Identifiable Information (PII) must be redacted.
  - a. CARES will supply a secured digital folder as needed/requested.

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### VOUCHER PROCESS TIMELINE

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

1. **BUSINESS DAY 1-3:** CARES UFA Funding Analyst completes review of vouchers (in the order received) for eligibility, accuracy and completion for payment and sends to CARES Finance Team to review fiscal accuracy.
2. **BUSINESS DAY 4:** CARES Finance Team processes drawdown from eLOCCS and notifies UFA Funding Analyst and CARES Director of Grants and Contracts when complete.
3. **BUSINESS DAY 5-6:** After funds are drawn down from eLOCCS, CARES Director of Grants and Contracts 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 schedule - see pages 49-50).

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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 UFA Funding Analyst will contact the agency to inform and request correction. CARES (as UFA) will not complete or edit any vouchers. *CARES (as UFA) will not complete or edit any vouchers on behalf of subrecipients.*
2. The agency must resubmit the corrected voucher within two business days for payment per the above voucher submission schedule to guarantee reimbursement in that month.

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#### REIMBURSEMENT TO AGENCIES

1. CARES will draw down funds from eLOCCS on a weekly basis or as needed to reimburse approved vouchers.
2. CARES will transfer the appropriate funds to subrecipients' bank accounts within ten (10) business days of the voucher approval.
  - a. See [Appendix H](#) to view the Unified Funding Agency (UFA) Credit Authorization Form.
3. Funds will be transferred in a single lump sum to the agency via ACH direct deposit.
  - 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.

---

#### ADVANCE PAYMENT TO SUBRECIPIENTS

Advanced payments are not required to be made by the Unified Funding Agency. An advanced payment is defined as a payment made prior to the subrecipient contract being executed. The decision to advance payment/s is at the discretion of CARES and its Board of Directors.

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## 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 subaward 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.

FINAL

# 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. Note: New projects are afforded additional time to expend funds due to the unique nature of start-up activities (e.g., hiring, construction).

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 between subrecipients will be considered at least once per quarter until 30 days after the end of the contract term.

## 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	Request Spending Plan if Actual % Spent is	Discuss Shift of Unspent Funds, unless spending plan is enacted (for other project use during the current contract year only)
Close of Q1 (Dec 31 <sup>st</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 (Mar 31 <sup>st</sup> )	50%	< 40%	< 30%
Close of Q3 (Jun 30 <sup>th</sup> )	75%	< 65%	< 55%
Aug 15 <sup>th</sup>	All budgets will be reviewed prior to the final month of vouchering (vouchers for final project costs incurred through August 31 <sup>st</sup> should be submitted no later than September 30 <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: ACCH Board, Fiscal Advisory Committee, Operations Committee, HUD

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

FINAL

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# ENSURING FAIR & EQUITABLE DISTRIBUTION OF REDIRECTED FUNDS

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## POLICIES

CARES (as UFA) and the Albany County Coalition on Homelessness (ACCH) 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 not currently employed by an agency funded through the Albany UFA, review and score an application developed by the ACCH NOFA Committee.
  - In the event of early redirection, the currently approved application will be used.
- Rank and Review Committee weighs current community needs for additional funding and makes funding recommendation/s to the ACCH Board; and
- Final decision/s by the ACCH Board via majority vote, excluding members whose agencies are under consideration to receive redirected funding (i.e., they must abstain from voting).
- Agencies giving up funds for redirection remain responsible for reporting on the funds until recaptured by another agency. The agency will receive a new voucher with reduced funds to reflect the redirected funds, noting how much has been taken on by other agencies, and what remains on the original agency’s books.
  - Redirecting funds late in the grant year for two or more consecutive years (after receiving technical assistance) may negatively impact an agency’s Rank and Review score/s.

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## PROCEDURES

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### VOLUNTARY APPLICATION PROCESS FOR REDIRECTED FUNDS

1. An agency should immediately alert the UFA Funding Analyst if it is unable to expend all funds within a contract year.
2. Eligible agencies may submit a Redirected Funding Application (provided during the grant year by CARES) to the UFA 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.)
3. UFA Funding Analyst verifies application is complete and forwards to the Review Team selected by the NOFA Committee each year.

4. Review Team scores applications and may conduct interviews with applicants. When applications are not competitive (enough redirected funds available for all applicants), Review team will review applications for eligibility and will issue an approval or disapproval.
5. A CARES representative shares the application scores, ranking of projects per scores, as well as pertinent spending reports with the ACCH Board.
6. The ACCH 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.

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.

Prior to grant close-out, funds committed towards redirection will be utilized in the order received, unless funds movement requires a formal grant amendment. After agencies sign close-out letters, the UFA will redirect funds as requested as available with Board approval.

7. The UFA Funding Analyst shares the ACCH Board's final application ranking and tiering, the quarterly spending report, and the total amount of redirected funds available for transfer with the Fiscal Advisory Committee.
8. CARES will send the redirection request to HUD to display the movement of funds.
9. After HUD approval, CARES will process budget addendums and send updated vouchers to affected agencies.

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#### PROCEDURE FOR INVOLUNTARY REDIRECTION

1. After the second quarter of vouchering is complete, CARES will notify agencies of any project under-spending (based on established thresholds).
2. Agencies may submit a written description of their spending plan for the under-spending project to the UFA 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 ACCH Board.

5. The ACCH 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.

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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 (excluding Leasing funds) for both their original award and for the redirected funds, and as detailed in each subaward agreement.
3. The ACCH 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 NOFO application requests.
- Multiple years of releasing project funding for purposes of redirection may have negative repercussions on Rank and Review and/or Redirect Application scores.

# 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 Albany County Coalition on Homelessness (ACCH) Operations Committee and Collaborative Applicant (CA).

With the assistance of the CA, the Operations Committee provides recommendations for specific topics of focus for each monitoring cycle and approves tools and processes. The ACCH Board maintains oversight of the process and receives updates on 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' UFA Funding Analyst 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) is complete and accurate.
6. If staff wages are charged to more than one funding source, there are timecards and/or time certifications to support the amounts charged to the grant.
7. Costs charged to the grant are eligible under the program.

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## **SINGLE AUDIT MONITORING**

CARES will review any findings from subrecipient audits during the beginning of the grant term. During fiscal monitoring, CARES will inquire if any findings were resolved or if a plan is in place to resolve them. CARES will request documentation or attestation of efforts to resolve findings.

If there has been no action to resolve findings by grant close-out, 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 vouchering process.

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

- The project's budget items and activities are eligible based on federal regulations; 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

Before the start of the grant term, each program will be scored for risk level using the Subrecipient Risk Assessment Tool ([Appendix J](#)). In the event a program is determined to be high-risk, the High-Risk Voucher Review Schedule ([Appendix K](#)) will be enacted. CARES and the agency will develop a corrective action plan to mitigate risk. Once the plan has been satisfied, CARES will notify the agency that the program has been re-categorized as Low-Risk.

Throughout the grant term, programs will be automatically marked High-Risk if one or more of the following criteria are met:

- Turnover of Fiscal Supervisor occurs (CFO or Director of Finance level)
- Request submitted for exception/waiver to the Vouchering Schedule commitment
- Review reveals inadequate fiscal management
- Review reveals funds claimed for ineligible activities
- Review reveals inaccurate expenditures of awarded funds per contract details

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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 NOFO cycle, the project will have an additional quarter to demonstrate progress on their action plan. Otherwise, continued deficient performance may result in redirecting of funds and/or significant amendments to the existing contract at the discretion of the ACCH 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 I](#)) that the grant has been performed according to the terms and conditions of the executed Subaward Agreement, and that no known outstanding programmatic or financial issues exist. Subrecipients will have 15 business days to complete and return the form to CARES.

If closeouts are not finalized within those 15 business days, the current grant years' vouchers received will not be processed until close-out requirements are met.

FINAL

# VI. APPENDICES

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## APPENDIX A: GLOSSARY OF COMMONLY USED TERMS

**2 CFR Part 200:** Uniform administrative requirements, cost principles and audit requirements for federal awards

**Budget Amendment:** a reduction in funds from one budget line to another more than 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.

**CA:** Collaborative Applicant

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

**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 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.

7 Wells Street, Suite 103A

Saratoga Springs, NY 12866

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#### CONTACTS

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## APPENDIX C: CoC-FUNDED PROJECT DESCRIPTIONS

### NY-503 Albany County Coalition on Homelessness

#### Project Listing for Certification of Consistency with the Consolidated Plan 2023

##### NEW PROJECTS

##### **CARES of NY, Inc. (CARES)**

###### **County CoC Planning Project**

\$353,846

This program supports coordination and facilitation of the CoC's processes, including strengthening the current CoC system, assisting with the development and implementation of a coordinated assessment system, conducting project evaluation and monitoring, conducting an annual gaps analysis and Point-in-Time Count, participating in the Consolidated Plan, and preparing and submitting the CoC's application to HUD.

###### **Albany County UFA Project**

\$212,307

This program supports duties noted within 24 CFR 578.11. Staff funded through this project will work collaboratively with the 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 legally binding agreements with subrecipients
- (3) develop policies to monitor and require that subrecipients establish fiscal controls and review them annually
- (4) obtain approval from CoC membership in advance of requesting grant amendments from HUD.

Staff work with HUD Regional office to ensure:

- (1) legal agreements with subrecipients are entered into in a timely manner
- (2) organizations receive and distribute funds for all projects in a timely manner
- (3) organizations share administrative funds with subrecipients.

Project staff will ensure subrecipients establish necessary fiscal controls and fund account procedures and will monitor subrecipients for compliance with CoC Program regulations annually. In addition, project staff will submit all required reports and audits to HUD.

## RENEWAL PROJECTS

### **Albany Damien Center (Damien Center)**

#### **Damien Center Housing**

\$317,495

This PSH program serves 19 chronically homeless persons diagnosed with HIV. In addition to chronic homelessness and HIV, some tenants are also diagnosed with substance use disorders. The program goal is for 100% of tenants to maintain permanent housing within the program or exiting the program into their own permanent housing.

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### **Albany Housing Authority (AHA)**

#### **AHA – AHC S Plus C for Homeless Veterans with Disabilities**

\$350,455

This project provides 25 housing vouchers to homeless veterans with disabilities related to mental illness. The Albany Housing Coalition, Inc. (AHC) provides program intake, eligibility screening, identification of landlords and affordable housing options, lease negotiation, and placement, prior to move-in. AHC case managers remain in contact with clients via phone and face-to-face visits to ensure compliance with their residential plans.

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### **Albany Housing Coalition, Inc. (AHC)**

#### **AHC Operations at 280 Clinton Avenue**

\$21,400

This Transitional Housing (TH) program provides five units of ‘more-independent’ transitional housing for homeless veterans with six months sobriety, many of whom will have graduated and transitioned from the program at the more-supervised Vet House. Living at 280 Clinton Avenue allows participants to continue receiving case management services and enables them to save money in preparation for transitioning to self-sufficiency and independent living in the community.

#### **AHC PSH for Homeless Veterans**

\$114,697

Walter Street Residence and PSH for Homeless Veterans were consolidated into one project. The Walter Street Residence provides 12 units of permanent Single Room Occupancy (SRO) housing in a supportive environment for formerly homeless veterans with a disabling condition, who are mature, stable and interested in the camaraderie of congregate living with other veterans. PSH for Homeless Veterans is an eight-bed, scattered-site, Permanent Supportive Housing Program for veterans who are homeless and live with mental health or substance use disorders.

### **AHC Rapid Rehousing for Homeless Veterans**

\$114,886

This Rapid Rehousing for Homeless Veterans (RRHV) program utilizes the Housing First and Homeless Veteran Reintegration Program models to help homeless veterans identify and establish steady sources of income to achieve and sustain stability in housing of their choice, and to ensure their homelessness is brief, non-recurring and rare. Funds provide salary for one full-time housing navigator and rental subsidies for 30 veteran households per year.

### **AHC Veterans House**

\$108,689

VH Addition and VH Main consolidated into one project which provides supportive transitional housing for homeless veterans (including chronically homeless veterans) in a sober, supervised, congregate environment with 28 Single Room Occupancy (SRO) units, and provides housing, meals, and case management services. Veterans House is the point-of-intake into the agency's continuum of housing and services. Veterans live in a safe, healthy environment while pursuing mainstream activities and gainful employment through the Veterans Employment Program. The goal is to help participants achieve independent living in affordable housing within the community.

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## **Capital Area Peer Services (CAPS)**

### **100 Clinton Ave Apartments**

\$123,367

This program provides PSH for men living with an Axis I Mental Health diagnosis, as well as support in the form of personal goal orientated service planning, transportation assistance and medication management. Staff assistance is available six days per week with 24-hour on-call service in the event of an emergency during the hours without staffing.

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## **CARES of NY, Inc. (CARES)**

### **Albany HMIS**

\$82,431

HMIS and HMIS Expansion consolidated into one project. The Albany County Portion of the Capital Region HMIS collects client level data from 94 programs operated by 21 agencies.

### **CARES PBRA for Homeless Persons Living with HIV/AIDS**

\$64,375

This Permanent Supportive Housing program allows participants to access and maintain safe, affordable, supportive housing. Participants engage in services in the community to address the needs of their disability which further stabilizes their housing.

### **CARES S Plus C for Persons Living with Disabilities (Yr 3)**

\$597,132

This project serves 90 singles and 14 families. Participants engage in services in the community to address the needs of their disability which further stabilizes their housing.

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## **Equinox, Inc. (Equinox)**

### **Domestic Violence Coordinated Entry**

\$71,223

This project provides the resources necessary for Equinox to review, develop and implement policies, procedures, and practices to equip the CoC's current Coordinated Entry system to meet the needs of survivors of domestic violence, dating violence, sexual assault, and/or stalking more safely and effectively.

### **Equinox Domestic Violence Rapid Rehousing**

\$1,039,342

This program helps victims in need of securing safe, affordable, and permanent housing, as well as to aid with transportation and emergency needs which impact their ability to attain self-sufficiency. The ultimate objective of this DV RRH program is to assist domestic violence victims in achieving and maintaining permanent, safe housing, increased financial stability, and an abuse-free life.

### **Equinox Transitional Living Project**

\$184,010

The project serves homeless youth ages 16-20 in need of housing and support to obtain permanent housing and self-sufficiency. The project serves single youth and parenting youth (families).

## **Homeless and Travelers Aid Society of the Capital District, Inc. (HATAS)**

### **HATAS Coordinated Entry**

\$76,182

This project supports the on-going work of the Coordinated Entry process in Albany County. The Coordinated Entry ensures that homeless households have access to services via a no-wrong door

approach. A standardized form is utilized that prioritizes needs based on vulnerability and severity, and which was developed by the CoC.

### **HATAS Pathways**

\$888,157

This project provides permanent housing and support services for 55 homeless households, including 24 singles and 31 homeless families with an adult living with a disabling condition (some chronically homeless). Rental subsidies make the housing affordable and case management focuses on increasing self-sufficiency through employment and life skills-building for homeless people with disabilities. Services include housing placement, assistance with mainstream benefits, case management, activities of daily living, help securing assistance with children's developmental and educational needs, job readiness activities and linkages to treatment and community services. Financial services include budgeting assistance and social security representative payee services.

### **HATAS Shelter Plus Care**

\$389,608

This project provides subsidized and supportive housing for 31 homeless single adults living with a mental health disabling condition. Some consumers also have co-occurring substance abuse disorders. Rental subsidies make the housing affordable, and case management focuses on increasing self-sufficiency and life skills-building for homeless persons with disabilities. Services include housing placement, assistance with mainstream benefits, activities of daily living, job-readiness activities, and linkages to treatment and community services.

### **The Next Step**

\$74,148

The Next Step is a RRH program for homeless single adults with a history of Justice System involvement. The program will work with Coordinated Entry to communicate vacancies/openings and accept referrals, and partner with other community providers to ensure the effective and holistic delivery of case management services and housing opportunities.

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### **Hope House, Inc.**

#### **Hope House PSH**

\$204,835

This PSH program provides fourteen housing vouchers to formerly homeless individuals and families with disabilities related to chronic substance abuse.

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## **In Our Own Voices (IOOV)**

### **IOOV TH RH for LGB TGNC**

\$270,000

This project provides transitional/rapid rehousing services for Lesbian, Gay, Bisexual, Transgender and Gender Non-Conforming (LGB TGNC) individuals (first in history of NY's Capital Region). IOOV offers effective, evidence-based programs for LGB TGNC individuals with a focus on Black, Indigenous, People of Color (BIPOC).

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## **IPH**

### **IPH Housing**

\$402,626

IPH Housing consists of three consolidated housing programs: Hope Through Housing, Sheridan Hollow Housing I, and Sheridan Hollow Housing II. Hope Through Housing provides permanent, affordable, scattered site housing and supportive case management to five homeless single adults who are living with a disability that has inhibited their ability to live independently without support.

The Sheridan Ave Housing Project provides long-term, supportive case management services to single adults residing in IPH's eight permanent supportive housing (PSH) units who have been chronically homeless and living with a disabling condition/s.

Sheridan Ave Housing Project II provides four PSH units to homeless families in which the head of household is living with a disabling condition that has inhibited the family's ability to maintain housing. The Housing Case Manager is located onsite for Sheridan Hollow Housing I & II projects, and both Housing Case Managers meet regularly with each resident/head of household to provide intensive services focused on long-term housing retention, stability, and overall self-sufficiency.

### **Multi-Division Housing: IPH HATAS SCCC Collaborative**

\$461,564

This project provides permanent supportive housing to six families (two per entity) and twenty-one singles (seven per entity). All households are chronically homeless and have a documented disabling condition. The program adheres to the Housing First model, accepting applicants regardless of income status, active or past substance use, criminal background, or history of domestic violence. In addition, participants are maintained in the program regardless of their participation in supportive services, progress on their goal plan, improvement or maintenance of income, experience with domestic violence, or any other activity or behavior not outlined in their lease agreement.

## Joseph's House and Shelter, Inc.

### **Kendal House**

\$84,971

This project provides 30 units of permanent SRO housing for people who have been living on the streets for years and who have alcohol dependence. The project has helped countless people get off the streets, have a home, and begin to make changes in their lives.

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## Legal Aid Society of Northeastern New York, Inc. (LASNNY)

### **Rapid Rehousing for Families**

\$205,959

This RRH project serves homeless families primarily sheltered by Albany County DSS at the Schuyler Inn & Marillac Family Shelter. 15 households receive Tenant Based Rental Assistance (TBRA). This project expands/complements LASNNY's Albany County Solutions to End Homelessness Program (STEHP) RRH program. Funding will expand the current capacity to provide TBRA and improve access to case management.

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## Rehabilitation Support Services

### **RSS – Albany SAIL**

\$97,708

This eight-bed, scattered site, Permanent Supportive Housing Program serves young adults ages 16-25 who are homeless and live with a mental illness. This program provides daily contact and intensive support to assist the participants with maintaining their housing and with utilizing community support to increase their independence in the community.

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## St. Catherine's Center for Children (SCCC)

### **SCCC Supported Housing Plus**

\$197,395

This PSH program serves five chronically homeless (CH) singles, including youth under 25, and persons with substance abuse disorders, mental illness, and/or HIV/AIDS and a documented disabling condition; and nine CH families (with an emphasis on large family units) most difficult to relocate from the emergency crisis system into permanent housing. The primary service offered is case management which emphasizes health (both physical and behavioral) and well-being of clients. The service also assists clients with the following:

1. Employment Readiness
  2. Household management and skill development relative to landlord/tenant problem resolution
  3. Identification of community resources (e.g., neighborhood associations, churches, schools) to support and assist these individuals and families, and to encourage clients to experience themselves as contributing members of the community.
  4. Inter-personal problem skill development emphasizing how to successfully live in diverse and complicated social environments.
- 

### **St. Peter's Addiction Recovery Center (SPARC)**

#### **SPARC S Plus C**

\$310,006

This PSH program provides 27 housing vouchers to formerly homeless individuals and families with disabilities related to chronic substance abuse. SPARC collaborates with Catholic Charities of the Diocese of Albany to provide rental assistance and case management for eligible participants.

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### **Support Ministries, Inc.**

#### **Support Ministries Arvilla House**

\$105,839

Arvilla House is a six-bed SRO providing housing and support services to homeless women living with HIV/AIDS.

#### **Support Ministries Project HELP**

\$118,413

This program provides permanent supportive housing and related services to three homeless individuals living with HIV/AIDS and three families of which one member is living with HIV/AIDS in a scattered site apartment program. Funding is used to rent the apartments, and for utility, insurance, supply, and equipment costs. The additional funds cover the cost of a program manager and outreach staff.

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## APPENDIX D: VOUCHER REVIEW SCHEDULE

### UFA Fiscal Oversight – Voucher Review Schedule

As UFA, CARES ensures fiscal integrity of the program by providing reasonable, thorough, and consistent fiscal oversight of each subrecipient and all programs supported by UFA funds. CARES is proposing a voucher review policy that displays the timing and level of fiscal review across various scenarios. Below are details about this process.

#### Transitioning to UFA

During the first year a CoC becomes a UFA, CARES will conduct full fiscal backup review once each quarter to ensure ongoing sound fiscal practices, budget line-item eligibility, and claim accuracy throughout the grant year.

- The initial review would be onsite to view leases, invoices and payment records, personnel documentation, and recordkeeping practices.
- Monitoring would occur mid-grant year to follow up on any Single Audit findings, review select fiscal policies, and program income tracking.
- Each voucher not subject to a full backup review will still be reviewed for eligibility of activities/categories across claimed budget lines.

#### Operating UFA

Once the UFA CoC has completed the transition period, CARES will continue to review each voucher by providing reasonable, thorough, and consistent fiscal oversight. Each agency will have the ability to select between a monthly, bimonthly, or quarterly voucher submission schedule. This schedule will then determine a fiscal review schedule. The schedule is as follows:

	<b>Monthly Submissions</b>	<b>Bimonthly Submissions</b>	<b>Quarterly Submissions</b>
<b>Month 1</b>	<b>Onsite full backup review*</b>		
<b>Month 2</b>	Category verification per Budget Line Item (BLI)	<b>Onsite full backup review*</b>	
<b>Month 3</b>	Category verification per BLI *HUD Quarterly Meeting*	*HUD Quarterly Meeting*	<b>Onsite full backup review*</b> *HUD Quarterly Meeting*
<b>Month 4</b>	Category verification per BLI	Category verification per BLI	
<b>Month 5</b>	Category verification per BLI		
<b>Month 6</b>	<b>Virtual full backup review + monitoring</b> *HUD Quarterly Meeting*	<b>Virtual full backup review + monitoring</b> *HUD Quarterly Meeting*	<b>Virtual full backup review + monitoring</b> *HUD Quarterly Meeting*

<b>Month 7</b>	Category verification per BLI		
<b>Month 8</b>	Category verification per BLI	Category verification per BLI	
<b>Month 9</b>	Category verification per BLI *HUD Quarterly Meeting*	*HUD Quarterly Meeting*	Category verification per BLI *HUD Quarterly Meeting*
<b>Month 10</b>	Category verification per BLI	Category verification per BLI	
<b>Month 11</b>	Category verification per BLI		
<b>Month 12</b>	Category verification per BLI *HUD Quarterly Meeting*	Category verification per BLI *HUD Quarterly Meeting*	Category verification per BLI *HUD Quarterly Meeting*
<p><b>*Voucher with full backup must be submitted virtually to receive payment. All previously submitted vouchers will be reviewed.</b></p> <p><i>BLI is Budget Line Item</i></p>			

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

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

Grantee: AGENCY NAME  
 Grant/Project: PROJECT NAME/TITLE  
 Grant Number: NY000XXXXXX

Grant Year: 9/1/2023-8/31/2024  
 Current Budget Version:  
 Revised 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	\$ -	\$ -	\$ -	\$ -
<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: \_\_\_\_\_

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

\_\_\_\_\_  
 Date

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

**For UFA-Adminstrating Agency (CARES) use only:**

Denied

Approved

\_\_\_\_\_  
 Authorized CARES Staff (Signature)

\_\_\_\_\_  
 Authorized CARES Staff (Print Name/Title)

\_\_\_\_\_  
 Date

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

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

Grantee: AGENCY NAME  
 Grant/Project #1: PROJECT NAME/TITLE  
 Grant Number: NY000XXXXXX

Grant Dates: 9/1/2023-8/31/2024  
 Current Budget Version:  
 Revised Budget Version:

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

Grantee: AGENCY NAME  
 Grant/Project #2: PROJECT NAME/TITLE  
 Grant Number: NY000XXXXXX

Current Budget Version:  
 Revised Budget Version:

BUDGET LINE	Modifications		
	PROJECT 2 CURRENT APPROVED BUDGET	INCREASE IN BUDGET <small>Show numbers in this column as a positive</small>	REVISED BUDGET
Leasing	\$ -	\$ -	\$ -
Rental Assistance	\$ -	\$ -	\$ -
Support Services	\$ -	\$ -	\$ -
Operating	\$ -	\$ -	\$ -
HMIS	\$ -	\$ -	\$ -
Admin	\$ -	\$ -	\$ -
<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 Budget to be effective as of date:

Authorized Agency Signatory (Signature)

Date

Authorized Agency Signatory (Print Name/Title)

**For UFA-Administrating Agency (CARES) use only:**

Denied

Approved

Authorized CARES Staff (Signature)

Date

Authorized CARES Staff (Print Name/Title)

# APPENDIX G: VOUCHER TEMPLATE

UFA: Voucher/Expense Reimbursement Claim					
GRANT / PROJECT	Project Name	CLAIM PERIOD START		CLAIM PERIOD END	
GRANTEE	Agency Name	GRANT DATES	09/01/2023 - 08/31/2024	AWARD AMOUNT	\$0.00
Grant Number	CURRENT	CUMULATIVE REIMBURSEMENTS	TOTAL EXPENSES	TOTAL EXPENSES	REMAINING
Budget Version Number: 1	APPROVED BUDGET	PRECEDING THIS CLAIM	IN THIS CLAIM	TO DATE	BUDGET BALANCE
BUDGET LINE	Approved budget modifications will be reflected in this column.	See total approved expenses on the 03/08/2023 worksheet.	See total expenses on the 03/08/2023 worksheet.	Sum of Reimbursements and the claim's Total Expenses.	Difference of Current Budget and Total Expense To Date.
1030 Operating	\$ -	\$ -	\$ -	\$ -	\$ -
1040 Rental Assistance	\$ -	\$ -	\$ -	\$ -	\$ -
1050 Support Services	\$ -	\$ -	\$ -	\$ -	\$ -
1054 HMIS Costs	\$ -	\$ -	\$ -	\$ -	\$ -
1060 Admin Awarded	\$ -	\$ -	\$ -	\$ -	\$ -
1064 UFA Planning Costs	\$ -	\$ -	\$ -	\$ -	\$ -
1100 Leasing	\$ -	\$ -	\$ -	\$ -	\$ -
<b>TOTAL</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

PROGRAM INCOME WITHIN THE CLAIM PERIOD	
Did this project generate program income during the current claim period? (Answer Yes or No)	
(If yes) Description of Program Income	
(If yes) Amount of Program Income Received or Received Within Claim Period (\$)	
(If yes) Amount of Program Income Spent During Claim Period (\$)	
(If yes) Percentage of Program Income Spent Before Submitting this Claim (%)	

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.

[CLICK](#) the button to the left to save progress and close the file.

Authorized Agency Signatory (Signature)

Date

Authorized Agency Signatory (Print Name/Title)

[CLICK](#) the button to the left to sign the claim sheet, submit the claim, export PDFs of the claim and expenses sheets, and to save the file.

## APPENDIX H: CREDIT AUTHORIZATION FORM

### Albany County Coalition on Homelessness (ACCH) 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**

Please provide voided check below.

# APPENDIX I: ANNUAL GRANT CLOSEOUT CERTIFICATION FORM

## UFA Grant Closeout Agreement

Subrecipient:
Program Name/s:
Grant Number:
Grant Expiration Date:

Program Title	Amount
Total Grant Amount Authorized <i>Amount awarded prior to redirect if applicable</i>	\$
Grant Funds Disbursed <i>Total pass-through funds received from Grantee, accounting for redirected funds</i>	\$
Unused grant funds returned to UFA <i>Unspent award amount</i>	\$
Obligated redirected funds released from the contracted amount <i>Committed redirect award</i>	\$
Obligated redirected funds received over and above the contracted amount <i>Accepted redirect award</i>	\$

\*[Program Name] received/released \$[] through a budget modification\*

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 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;
- (3) All data provided in the table accurately reflects the exact amounts as shown in the subrecipient's financial system; and
- (4) Original match letters are accurate and will be accompanied by source documentation (i.e., contracts, timesheets for services) in the amount of 25% of the grant funds disbursed on eligible activities.

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 close-out. 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.

Special Conditions: 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

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Printed Name of Authorized Representative

CARES of NY, Inc. Signature

Date

\_\_\_\_\_  
Title

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

\_\_\_\_\_  
Title

FINAL

## APPENDIX J: SUBRECIPIENT RISK ASSESSMENT TOOL

Subrecipient Risk Assessment Tool						
Subrecipient:		Project Name				
Date:		Date Range Covered by Assessment				
Performed by:						
No. of Attributes	Risk Factor	Risk Criteria/Score (0 - 4)	Score	Weight	Weighted Score	Comments
1	Timeliness of Voucher Submission	2 -3 Untimely Submissions(4) 1 Untimely Submission (2) 0 Untimely Submission (0)	0	2.0	0	
2	Response to Spend Down Request	2-3 Untimely Submissions (4) 1 Untimely Submission (2) 0 Untimely Submission (0)	0	1.0	0	
3	Incorrect Amounts Claimed	>5% of Total Current Award (4) <5% of Total Current Award (2)	0	2.0	0	
4	Costs Claimed in Inaccurate Budget Lines	Several Times (4) 1-2 Times (2) Never (0)	0	2.0	0	
5	Ineligible Matching Funds	Yes (4) No (0)	0	2.0	0	
6	Expenditure Exceeds Micro-Purchase Threshold	Yes (2) No (0)	0	1.0	0	
<b>Composite Risk Score:</b>					<b>0</b>	

<b>Overall Assessed Risk Rating</b>	<i>Start Assessing Risk Factors</i>
-------------------------------------	-------------------------------------

Rating Determination Table		
	Lbound	Ubound
High	8	20
Low	0	7

# APPENDIX K: HIGH-RISK VOUCHER REVIEW SCHEDULE

## UFA Fiscal Oversight High-Risk Program Voucher Review Schedule

Before the start of the grant term, each program will be scored for risk level using the *Subrecipient Risk Assessment Tool*. In the event a program is determined to be high-risk, the **High-Risk Voucher Review Schedule** shown below will be enacted. CARES and the agency will develop a corrective action plan to mitigate risk. Once the plan has been satisfied, CARES will send a notification that the program has been re-categorized as Low-Risk.

### High-Risk Voucher Review Schedule

When high-risk is determined, the following voucher submissions will require backup as detailed below:

- If on a monthly submission schedule:
  - TA Session recommended
  - At a minimum, the next two vouchers must include requested backup\*
  
- If on a bi-monthly submission schedule:
  - TA Session recommended
  - At a minimum, the next voucher must include requested backup\*
  
- If on a quarterly submission schedule:
  - TA Session recommended
  - At a minimum, the next voucher must include requested backup\*

\*If fiscal management concerns or errors persist, further voucher sampling may be required.

### Additional High Risk Program Oversight

Throughout the grant term, programs will be noted as High-Risk if one or more of the following criteria are met:

- Turnover of Fiscal Supervisor occurs (CFO or Director of Finance level)
- Request submitted for exception/waiver to the Vouchering Schedule commitment
- Review reveals inadequate fiscal management
- Review reveals funds claimed for ineligible activities
- Review reveals inaccurate expenditures of awarded funds per contract details

Programs within newly funded agencies (during the first year receiving CoC funds) will be exempt from the High-Risk Schedule because source documentation is required to accompany every voucher submission.