

**Southern Nevada Regional Planning Coalition Committee on Homelessness (COH)  
Unified Funding Agency (UFA) Assessment Tool: Government Agency Assessment**

This tool is intended to assist entities considering applying to the Continuum of Care (CoC) to be its designated Unified Funding Agency (UFA) applicant to HUD. The tool helps the entities assess their capacity to meet HUD’s published UFA criteria,<sup>1</sup> and should be used prior to applying to HUD for UFA designation.

Note that the CoC continues to retain ultimate oversight over the UFA agency and that it continues to meet HUD’s requirements. As a result, there may be a CoC role in at least some of the requirements below.

|  |  | YES |                                       |  | NO |                              |
|--|--|-----|---------------------------------------|--|----|------------------------------|
|  |  | ✓   | Describe how entity meets requirement | List entity documents demonstrating compliance | ✓  | Action needed for compliance |
| <b>Your agency meets the following requirements:</b> |  |     |                                       |  |    |                              |
| <b>GENERAL REQUIREMENTS</b>                          | <ul style="list-style-type: none"> <li>• <b>The Continuum of Care (CoC) has designated it as the CoC’s representative for the following:</b> <ul style="list-style-type: none"> <li>○ Collaborative Applicant?</li> <li>○ UFA applicant to HUD?</li> </ul> </li> </ul>   |     |                                       |  |    |                              |
|  | <ul style="list-style-type: none"> <li>• <b>Has documentation from <u>all</u> potential subrecipients to which CoC Program funds will be allocated meeting both the following:</b> <ul style="list-style-type: none"> <li>○ That each organization will allow the UFA, if designated, to become the recipient for grant funds</li> <li>○ Approval of this in the appropriate form (e.g., letter from each potential subrecipient signed by the authorized official)</li> </ul> </li> </ul> |     |                                       |  |    |                              |
|  | <ul style="list-style-type: none"> <li>• <b>Is a legal entity?</b></li> </ul>  |     |                                       |  |    |                              |

<sup>1</sup> Based primarily on the information in the CoC Program Interim Rule and the 2013 CoC Registration Notice.

Southern Nevada Regional Planning Coalition Committee on Homelessness (COH)  
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|                   |   | YES |                                       |  | NO |                              |
|-------------------|---|-----|---------------------------------------|--|----|------------------------------|
|                   |   | ✓   | Describe how entity meets requirement | List entity documents demonstrating compliance | ✓  | Action needed for compliance |
|                   | <ul style="list-style-type: none"> <li>• Able to enter into legally binding agreements with the following:                             <ul style="list-style-type: none"> <li>○ HUD?</li> <li>○ Subrecipients?</li> </ul> </li> </ul>   |     |                                       |  |    |                              |
|                   | <ul style="list-style-type: none"> <li>• Able to receive and distribute funds to subrecipients?</li> </ul>  |     |                                       |  |    |                              |
|                   | <ul style="list-style-type: none"> <li>• Able to prepare and process grant agreement amendments?                             <ul style="list-style-type: none"> <li>○ With prior approval of CoC?</li> <li>○ For submission to HUD?</li> </ul> </li> </ul>                                |     |                                       |  |    |                              |
|                   | Your agency has the capacity to perform these oversight and monitoring requirements over subrecipients: <sup>2</sup>  |     |                                       |  |    |                              |
| <b>MONITORING</b> | <ul style="list-style-type: none"> <li>• Monitor subrecipients, at least annually, programmatically and fiscally to ensure all subrecipients meet these:                             <ul style="list-style-type: none"> <li>○ Maintain confidentiality of records?</li> </ul> </li> </ul> |     |                                       |  |    |                              |
|                   |   |     |                                       |  |    |                              |

<sup>2</sup> CoC likely has a role in developing and overseeing related policies and procedures. However, the CoC’s role may relate more to ultimate oversight and issues like ensuring an overall fair process, while the UFA agency’s role may involve issues like direct interactions with subrecipients. As a result, both the CoC and UFA agency may have created policies and procedures on this, but they should be complementary and consistent with each other. Alternatively, the CoC and UFA agency could develop one set of procedures clearly detailing the roles of all relevant parties.

Southern Nevada Regional Planning Coalition Committee on Homelessness (COH)  
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|   | YES |                                       | NO   |   |                              |
|---|-----|---------------------------------------|--|---|------------------------------|
|   | ✓   | Describe how entity meets requirement | List entity documents demonstrating compliance | ✓ | Action needed for compliance |
| ○ Ensure privacy of location of family violence projects?   |     |                                       |  |   |                              |
| ○ Are in compliance with education services to children including having a designated staff person? |     |                                       |  |   |                              |
| ○ Have no officers or employees who are debarred or suspended from doing business with HUD?         |     |                                       |  |   |                              |
| ○ Provide required data and reports?  |     |                                       |  |   |                              |
| ○ Provide eligible activities as outlined in the grant agreement(s)?                                |     |                                       |  |   |                              |
| ○ Serve eligible population(s)?   |     |                                       |  |   |                              |

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|                            |  | YES |                                       |  | NO |                              |
|----------------------------|--|-----|---------------------------------------|--|----|------------------------------|
|                            |  | ✓   | Describe how entity meets requirement | List entity documents demonstrating compliance | ✓  | Action needed for compliance |
|                            | <ul style="list-style-type: none"> <li>○ Adequately document all of these below:                             <ul style="list-style-type: none"> <li>▪ Homelessness?</li> <li>▪ Disability (as applicable)?</li> <li>▪ Rent calculation (as applicable)?</li> </ul> </li> </ul>   |     |                                       |  |    |                              |
| <b>FINANCIAL OVERSIGHT</b> | <ul style="list-style-type: none"> <li>• Ensure subrecipients have adequate fiscal controls and accounting procedures by verifying the following:                             <ul style="list-style-type: none"> <li>○ Subrecipients have established controls and procedures?</li> <li>○ Verified that these controls and procedures comply with applicable HUD requirements (e.g., 24 CFR part 84 for nonprofits, 24 CFR part 85 for state or local governments)<sup>3</sup>?</li> <li>○ Subrecipients follow these procedures?</li> </ul> </li> </ul> |     |                                       |  |    |                              |
|                            | <b>Your agency can provide copies of these written documents:</b>  |     |                                       |  |    |                              |

<sup>3</sup> Note that HUD will be publishing regulations implementing OMB’s final guidance on Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (available at: <https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards>) that will supersede relevant HUD regulations, including 24 CFR parts 84 and 85. OMB issued the final guidance on December 26, 2013, and provided the following timeline for federal agencies to issue implementing regulations: (1) draft due to OMB 6 months following the guidance’s publication date, and (2) final ones to be put out in a coordinated release and effective 12 months following the guidance’s publication date. Supplemental resources on the OMB guidance are available here: [http://www.whitehouse.gov/omb/grants\\_docs](http://www.whitehouse.gov/omb/grants_docs). The entity considering applying for UFA designation should review the new requirements, keep abreast of HUD’s progress on implementing regulations, and ensure both the agency’s and its subrecipients comply with all applicable requirements.

Southern Nevada Regional Planning Coalition Committee on Homelessness (COH)  
 Unified Funding Agency (UFA) Assessment Tool: Government Agency Assessment

|   |  | YES |                                       |  | NO |                              |
|---|--|-----|---------------------------------------|--|----|------------------------------|
|   |  | ✓   | Describe how entity meets requirement | List entity documents demonstrating compliance | ✓  | Action needed for compliance |
| <b>REQUIRED POLICIES AND PROCEDURES</b> | <ul style="list-style-type: none"> <li>• <b>Financial Management Systems Policies and Procedures?</b> <ul style="list-style-type: none"> <li>○ Including an organizational chart that sets forth lines of responsibility?</li> <li>○ Including those listed in the FINANCIAL MANAGEMENT POLICIES AND PROCEDURES: CONTENT section?</li> </ul> </li> </ul> |     |                                       |  |    |                              |
|   | <ul style="list-style-type: none"> <li>• <b>Subrecipient Conflict of Interest Procedures: reviewing for evidence of conflict of interest between these:</b> <ul style="list-style-type: none"> <li>○ UFA and subrecipient?</li> <li>○ Subrecipient and its contractor(s)?</li> </ul> </li> </ul>   |     |                                       |  |    |                              |
|   | <ul style="list-style-type: none"> <li>• <b>Policies and Procedures for Managing Non-Compliant Subrecipients?<sup>2</sup></b> <ul style="list-style-type: none"> <li>○ Ensuring that noncompliant subrecipients are brought into compliance?</li> <li>○ Currently in place?</li> </ul> </li> </ul>   |     |                                       |  |    |                              |
|   | <ul style="list-style-type: none"> <li>• <b>Procedures for High-Risk Subgrantee Management?<sup>2</sup></b> <ul style="list-style-type: none"> <li>○ Ensure that “high risk” subrecipients receive proper oversight and monitoring?</li> </ul> </li> </ul>   |     |                                       |  |    |                              |

Southern Nevada Regional Planning Coalition Committee on Homelessness (COH)  
 Unified Funding Agency (UFA) Assessment Tool: Government Agency Assessment

|                                     |  | YES |                                       |  | NO |                              |
|-------------------------------------|--|-----|---------------------------------------|--|----|------------------------------|
|                                     |  | ✓   | Describe how entity meets requirement | List entity documents demonstrating compliance | ✓  | Action needed for compliance |
| <b>AUDIT</b>                        | <ul style="list-style-type: none"> <li>• <b>Most recent OMB Circular A-133 audit?</b> <ul style="list-style-type: none"> <li>○ Does the audit indicate that the entity has no material weaknesses, deficiencies, or concerns that HUD considers to be relevant to the CoC Program financial management?</li> <li>○ If yes, then the entity must provide documentation showing how those weaknesses have been removed or are being addressed</li> </ul> </li> </ul> |     |                                       |  |    |                              |
|                                     | Your agency's financial management system meets the following minimum criteria: <sup>4</sup>   |     |                                       |  |    |                              |
| <b>OVERALL FINANCIAL MANAGEMENT</b> | <ul style="list-style-type: none"> <li>• <b>Discloses financial results of activities</b> <ul style="list-style-type: none"> <li>○ Accurately?</li> <li>○ Completely?</li> <li>○ On a current basis?</li> <li>○ Compliant with the grant's or subgrant's financial reporting requirements?</li> </ul> </li> </ul>  |     |                                       |  |    |                              |

<sup>4</sup> Based on 24 CFR 85.20 and applying to state or local governments. However, see footnote 3 for changing requirements that will apply. Applicants will need to comply with all relevant requirements that HUD establishes. Additional criteria from the 2014 CoC Registration Notice is included as well.

Southern Nevada Regional Planning Coalition Committee on Homelessness (COH)  
 Unified Funding Agency (UFA) Assessment Tool: Government Agency Assessment

|  | YES |                                       | NO   |   |
|--|-----|---------------------------------------|--|---|
|  | ✓   | Describe how entity meets requirement | List entity documents demonstrating compliance | ✓ |
| <ul style="list-style-type: none"> <li>• <b>Has recordkeeping that does the following:</b> <ul style="list-style-type: none"> <li>○ Ensure records identify adequately the source and application of funds for federally-sponsored activities, including information on grant or sub grant awards and authorizations, obligations, unobligated balances, assets, liabilities, outlays or expenditures and income?</li> <li>○ Maintains accounting records including cost accounting records that are supported by source documentation?</li> </ul> </li> </ul> |     |                                       |  |   |
| <ul style="list-style-type: none"> <li>• <b>Ensures effective control over and accountability for all funds, property and other assets?</b> <ul style="list-style-type: none"> <li>○ Adequately safeguard all such property and must assure that it is used solely for authorized purposes?</li> <li>○ Make sure its subrecipients do the same?</li> </ul> </li> </ul>   |     |                                       |  |   |
| <ul style="list-style-type: none"> <li>• <b>Compares outlays with budget amounts for each award and related to performance data?</b> <ul style="list-style-type: none"> <li>○ Financial information is related to performance or productivity data, including the development of unit cost information whenever appropriate or specifically required in the grant or subgrant agreement?<sup>5</sup></li> </ul> </li> </ul>  |     |                                       |  |   |

<sup>5</sup> If unit cost data are required, estimates based on available documentation will be accepted whenever possible

Southern Nevada Regional Planning Coalition Committee on Homelessness (COH)  
 Unified Funding Agency (UFA) Assessment Tool: Government Agency Assessment

|   |  | YES |                                       | NO   |   |
|---|--|-----|---------------------------------------|--|---|
|   |  | ✓   | Describe how entity meets requirement | List entity documents demonstrating compliance | ✓ |
| FINANCIAL MANAGEMENT POLICIES AND PROCEDURES: CONTENT | <ul style="list-style-type: none"> <li>• <b>Has <u>and follows</u> written procedures on the following:</b> <ul style="list-style-type: none"> <li>○ <b>Minimizing the time elapsing between the transfer of funds to the recipient from the U.S. Treasury and recipient or subrecipient disbursement whenever advance payment procedures are used?</b> <ul style="list-style-type: none"> <li>▪ <b>Ensuring reports on subgrantees' cash balances and cash disbursements are received in sufficient time to enable them to prepare complete and accurate cash transactions reports to the awarding agency?</b></li> <li>▪ <b>Making drawdowns as close as possible to the time of making disbursements when advances are made by letter-of-credit or electronic transfer of funds methods?</b></li> <li>▪ <b>Monitoring subrecipient cash drawdowns to assure they conform substantially to the same standards of timing and amount as apply to advances to the recipients?</b></li> </ul> </li> <li>○ <b>Ensuring a process is in place so that CoC Program funds are drawn from LOCCS at least once quarterly (LOCCS/Drawdown Procedures)</b></li> <li>○ <b>Distributing CoC Program funds to subrecipients within 45 days of the subrecipient providing source documentation of eligible costs</b></li> <li>○ <b>Determining the following regarding costs:<sup>6</sup></b> <ul style="list-style-type: none"> <li>▪ <b>Reasonableness?</b></li> <li>▪ <b>Allocability?</b></li> <li>▪ <b>Allowability?</b></li> </ul> </li> </ul> </li> </ul> |     |                                       |  |   |

<sup>6</sup> See footnotes 4 and 3 for related information.



Southern Nevada Regional Planning Coalition Committee on Homelessness (COH)  
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|  |  | YES |                                       | NO   |   |
|--|--|-----|---------------------------------------|--|---|
|  |  | ✓   | Describe how entity meets requirement | List entity documents demonstrating compliance | ✓ |
| FINANCIAL MANAGEMENT POLICIES AND PROCEDURES: CONTENT<br>(CONTINUED) | <ul style="list-style-type: none"> <li>• Do the cost-related procedures above comply with both:                             <ul style="list-style-type: none"> <li>○ Applicable Federal cost principles?<sup>7</sup></li> <li>○ Award’s terms and conditions?</li> </ul> </li> <li>• Do the policies and procedures include sections on the other criteria mentioned in OVERALL FINANCIAL MANAGEMENT?</li> </ul> |     |                                       |  |   |

<sup>7</sup> Applicable requirements are in one of the following: OMB Circular A-122 (Cost Principles for Non-Profit Organizations) (2 CFR part 230), OMB Circular A-87 (Cost Principles Applicable to Grants, Contracts and Other Agreements with State and Local Governments) (2 CFR part 225), or OMB Circular A-21 (Cost Principles for Education Institutions) (2 CFR part 220). However, see footnote 3 on changing requirements that will supersede these.

Southern Nevada Regional Planning Coalition Committee on Homelessness (COH)  
 Unified Funding Agency (UFA) Assessment Tool: Government Agency Assessment

|   |   | YES |                                       | NO   |   |                              |
|---|---|-----|---------------------------------------|--|---|------------------------------|
|   |   | ✓   | Describe how entity meets requirement | List entity documents demonstrating compliance | ✓ | Action needed for compliance |
|   | Your agency can meet these additional performance monitoring, evaluation, and targeted assistance-related requirements: <sup>2</sup>  |     |                                       |  |   |                              |
| PERFORMANCE MONITORING/EVALUAT AND EVALUATION | <ul style="list-style-type: none"> <li>• Has established performance targets for CoC Program-funded projects?                             <ul style="list-style-type: none"> <li>○ In consultation with recipients and subrecipients?</li> <li>○ Appropriate for the population and program types?</li> </ul> </li> </ul> |     |                                       |  |   |                              |
|   | <ul style="list-style-type: none"> <li>• Has an evaluation process for outcomes for the projects below:                             <ul style="list-style-type: none"> <li>○ ESG-funded projects?</li> <li>○ CoC Program-funded projects?</li> </ul> </li> </ul>  |     |                                       |  |   |                              |

DRAFT