



Discussion Guide:

Key Questions for Continuums of
Care (CoCs) Considering Unified
Funding Agency (UFA) Status



Unified Funding Agency (UFA) means an eligible applicant selected by the Continuum of Care to apply for a grant for the entire Continuum, which has the capacity to carry out the duties in §578.11 (b), which is approved by HUD and to which HUD awards a grant.

-24 CFR 578.3

PURPOSE OF THE GUIDE

The purpose of this guide is to assist Continuums of Care (CoCs) in understanding the Unified Funding Agency (UFA) designation that was established by the McKinney-Vento Act, as amended by the [Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\)](#) Act (the Act) passed by Congress in 2009 and further described by the [Continuum of Care Program Interim Rule](#).

The decision to apply for UFA status is made by the CoC. This discussion guide helps the stakeholders in a CoC understand the purpose and responsibilities of a UFA, and to provide a foundation for CoC decisions to pursue UFA status.

This discussion guide is organized into the following sections:

1. What is a UFA?

This section provides a quick overview of UFAs and basic eligibility.

2. What are the specific responsibilities of a UFA?

The Collaborative Applicant and the CoC should both review the full set of responsibilities of a UFA and ensure that the Collaborative Applicant has the capacity to fulfill these responsibilities. This section helps with this assessment.

3. What are the benefits to obtaining the UFA designation?

This section helps stakeholders in a CoC better assess the UFA designation and how, or if, it will benefit them.

4. What things must a CoC consider before it applies to become a UFA?

Even after a positive review of the CoC's capacity and benefits, there are other factors that a CoC should consider before applying for UFA status. This section reviews some of these additional factors CoCs need to consider.

5. What process should a CoC use to decide to become a UFA?

If a CoC is moving toward applying for UFA status, the CoC should define the decision-making process for the CoC to approve the Collaborative Applicant to apply for UFA status.

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The authors are solely responsible for the accuracy of the statements and interpretation contained in this publication. Such interpretations do not necessarily reflect the views of the Government. The substance and findings of the work are dedicated to the public.

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1. What is a UFA?

BACKGROUND

Section 402(g) of the Act defined the Unified Funding Agency (UFA) as a designation that allows a Collaborative Applicant to receive and distribute funding for all projects in a CoC under a single entity. This gives the Collaborative Applicant additional autonomy to make decisions about how funds should best be allocated among projects in the community as well as additional responsibility to monitor funds and project performance. While HUD permitted CoCs to apply for the UFA designation in the FY 2012 CoC Program Notice of Funds Available (NOFA) competition, it wasn't until the FY 2013 CoC Program competition that two communities successfully received the first UFA designations.

If a CoC determines it wants to be designated as a UFA, it applies for this status during the registration phase of the CoC Program Competition, or at a time designated by HUD. HUD must then approve UFA designation before the UFA can apply for UFA funds. The approval criteria that HUD uses can be found at §578.11(b) of the CoC Program Interim Rule. (Please note: these criteria are consolidated and shared in *Appendix A* of this Guide.)¹

ELIGIBILITY

To qualify as an eligible applicant, the Collaborative Applicant must meet all of the following criteria:

- Be a legal entity;
- Be either a nonprofit organization, a public housing agency, a State or local government or an instrumentality of local government;
- Be selected by the Continuum of Care;
- Have the capacity to carry out duties of a Collaborative Applicant; and
- Have both the capacity and the Written Standards to carry out the additional duties delegated to a UFA stated in 24 CFR 578.11 of the CoC Program Interim Rule.

A CoC is responsible to ensure that the Collaborative Applicant has the capacity to fulfill all the required UFA functions. To assist with that determination, two tools accompany this discussion guide, as appendices. One is a tool to help assess the Collaborative Applicant's governance capacity from the UFA prospective; and the other assesses the Collaborative Applicant's financial management capacity. To be successful as a UFA, a Collaborative Applicant must combine strong financial and grants management capacity with a CoC structure that is fully compliant with HUD-established [CoC governance requirements](#).

WHAT IS THE PROCESS FOR APPLYING TO BECOME A UFA?

The UFA designation process begins with a discussion between the CoC and the Collaborative Applicant to determine whether the Collaborative Applicant and the CoC meet the fundamental eligibility criteria. The HUD application review process is rigorous; therefore, it is essential that the CoC thoroughly assess the Collaborative Applicant's capacity. If that assessment establishes that the Collaborative Applicant meets HUD's basic requirements, CoC members then vote whether to authorize the Collaborative Applicant to proceed to apply to become a UFA during the registration process of the CoC Program competition, or at a time designated by HUD. It is strongly recommended by HUD that this issue be raised at one of the required open public meetings of the CoC to ensure community support for the Collaborative Applicant's pursuit of UFA designation.

¹ HUD: [The Continuum of Care Program: Unified Funding Agencies](#); Power point Presented by April Mitchell and Juanita Perry presented via Webinar April 24, 2013

The CoC should also develop a set of operating guidelines for the Collaborative Applicant, should they receive the UFA designation. The terms to consider for these operating guidelines are addressed in Section 4 of this document. Because the Act establishes significant autonomy for UFA-designated Collaborative Applicants, a CoC should consider in their authorizing vote questions like:

- Does the CoC want the UFA to have the authority to replace project applicants without authorization from the CoC?
- Does the CoC want the UFA to have the authority to assign itself as a replacement subrecipient?
- Does the CoC want to establish criteria for the UFA to replace subrecipients?

The Collaborative Applicant may only apply for UFA status during the registration process of the CoC Program competition, or at a time designated by HUD. If HUD approves a Collaborative Applicant to have UFA status then the Collaborative Applicant can apply as a UFA in the consolidated application of the CoC Program competition, including the ability to apply for a UFA costs project. Designation of UFA status does not impact the Collaborative Applicant's process for applying for CoC project funding nor does it affect the amount awarded under the CoC program. A Collaborative Applicant that has been approved for UFA status by HUD may apply for UFA costs in the CoC application; however, these funds are not guaranteed and the UFA should be prepared to meet its obligations without additional funds. In addition, CoCs should note, that once granted UFA status, a Collaborative Applicant must re-apply for UFA designation every year as part of the CoC Program competition process to retain their UFA status.

2. What are the Specific Responsibilities of a UFA?

When HUD designates a Collaborative Applicant as a UFA, the Collaborative Applicant accepts many new responsibilities. Those changes encompass both the CoC's relationship with HUD and how the UFA relates to its new subrecipients.

GRANTS WITH HUD

After grant award announcements, a UFA receives two grants:

- a. One grant for renewal projects, UFA costs, and CoC planning funds; and
- b. One grant for new projects.

New projects require a separate grant agreement because new awards may have a grant term longer than one year, the conditions for beginning new projects may take longer to satisfy than renewal projects (i.e., site control and environmental review), and there may be additional delays due to new construction, rehabilitation, and acquisition.

The consolidated renewal project grant agreement allows the CoC to establish a single start date for all subrecipients. HUD also includes the funds for the UFA costs and CoC planning in the renewal grant to allow those funds can be accessed as quickly as possible. While CoCs are not required to set a single operating start date, HUD recommends that they do so for ease of administration of the grant. The CoC, working with the UFA and HUD, should find a single start date that is administratively convenient. Setting a single start date makes grant changes easier and permits the UFA to operate a uniform grant cycle. The UFA and CoC should select a date that has meaning locally. The mechanisms to keep project funding whole during this transition, may impact the start date selection. The UFA should work closely with the local HUD Field Office to select the best start date.

CoC Program Interim Rule UFA Responsibilities

24 CFR 578.11 (c) “HUD-designated UFAs shall:

- (1) Apply to HUD for funding for all of the projects within the geographic area and enter into a grant agreement with HUD for the entire geographic area.
- (2) Enter into legally binding agreements with subrecipients, and receive and distribute funds to subrecipients for all projects within the geographic area.
- (3) Require subrecipients to establish fiscal control and accounting procedures as necessary to assure the proper disbursement of and accounting for federal funds in accordance with the requirements of 2 CFR Part 200 and corresponding OMB circulars.
- (4) Obtain approval of any proposed grant agreement amendments by the Continuum of Care before submitting a request for an amendment to HUD.

CONTRACTING WITH SUBRECIPIENTS**Subrecipients**

Once recognized as a UFA, the Collaborative Applicant also becomes the direct recipient for all funding from HUD to the CoC. The UFA takes upon itself the responsibility to fulfill all commitments stated in the CoC consolidated application, including the CoC and project applications. Thus, HUD will hold the UFA accountable for funding the number of units and serving the number of people, with any targeting associated with them, as stated in the application process. The UFA, under the direction of the CoC, should determine how best to administer the existing funds, including the selection of subrecipients. When organizations agree to be subrecipients, they accept the obligation to meet all program requirements and budget obligations committed to during the CoC Program application process and allow the UFA to monitor them to ensure each project meets its obligations. While HUD will be holding the UFA responsible for its commitments from the application process, it is up to the UFA to determine how to structure its relationships with subrecipients to fulfill their respective commitments. It is important to note that subrecipients must otherwise be eligible to receive HUD funds directly to be considered an eligible subrecipient of CoC Program funds through the UFA.

A UFA is **not** required to use specific subrecipients for their grants, unless so directed by the CoC. The UFA **may** replace a subrecipient if it is not compliant with the CoC Program requirements or no longer has the capacity or desire to continue carrying out the activities of the project. The UFA may find another eligible subrecipient that has the capacity to ensure that the project continues or carry out project activities on its own. In this light, CoCs should carefully consider the CoC’s role in delegating authority to its UFA. Under the Act, a UFA has the authority to replace subrecipients without consulting the CoC. CoCs should consider establishing local rules that constrain a UFA to utilizing subrecipients identified in the CoC Program competition process. A sample policy might be:

IF NO SUITABLE SUBRECIPIENT EXISTS OR THE ORIGINAL PROJECT APPLICANT HAS NO CAPACITY TO CURE DEFICIENCIES IDENTIFIED BY THE UFA, THEN A UFA CAN SEEK AN ALTERNATIVE SUBRECIPIENT.

Monitoring

The UFA is required to monitor subrecipients for both financial and programmatic compliance with the CoC Program application. Paragraph 578.23(c)(8) of the CoC Program Interim Rule states that recipients and subrecipients must submit to monitoring at least once a year. As a recipient of grant agreements directly from HUD, the UFA is subject to review by HUD. Subrecipient monitoring is the annual responsibility of the UFA. Additionally, as part of HUD's obligation to monitor the UFA, HUD may elect at any time to monitor a subrecipient for compliance with obligations made in the CoC Program application.

Financial Management

The UFA will draw all project funds directly from HUD through the Line of Credit Control System (LOCCS). The UFA will have one LOCCS account for its renewal project grant and a different LOCCS account for its new project grant (if applicable). The UFA is responsible for distributing funds to all subrecipients. The CoC Program Interim Rule at 24 CFR 578.85(c)2 requires that the subrecipient "distribute the appropriate portion of the funds to a subrecipient no later than 45 days after receiving an approvable request for such distribution from the subrecipient." The UFA must have the capacity to track payments to subrecipients, as all funds for CoC renewal projects will be aggregated in a single LOCCS account. The UFA must implement sufficient oversight procedures to ensure that payments to subrecipients are only for eligible and authorized expenses.

Because the renewal project grant encompasses all renewal projects, the CoC planning grant, and UFA costs grants, the UFA gains the ability to move funds across all projects within the grant. The UFA cannot move funds from UFA or CoC planning grants. Subject to local CoC oversight, the UFA may disperse funds between and among projects as long as the resulting shifts total less than 10 percent of the total grant award amount from one approved eligible activity category to another activity in a single year of the new project grant or renewal project grant award without a formal grant agreement amendment. However, funds may not be moved between the renewal project grant and new project grant. Budget changes exceeding 10 percent of an eligible activity category of the grant award cumulatively on an annual basis must be approved by HUD via a formal grant amendment. For changes below 10 percent, the CoC should work with the local HUD Field Office.

The ability to move funds across projects is a significant benefit to CoCs. Currently, the only way a CoC that is not designated as a UFA can move funds away from a project is to create a new project through the annual reallocation process, as outlined in the CoC Program NOFA. UFAs, however, have the ability to move funds outside of the competition process and can shift funds from one existing project to another, regardless of component type. They also can eliminate funding for a single project by moving funds to another project. Even with this authority, UFAs still must comply with the obligations of Section 578.105, which require a HUD-approved grant agreement amendment for permanent changes in targeted subpopulations, a permanent decrease in numbers of units, or for shifts of a single eligible activity category over 10 percent in a single year.

The UFA will need to work with its local HUD Field Office to make any changes to projects under the UFA grant. It is also important to note that the UFA must obtain approval of any proposed grant agreement amendments by the CoC before submitting a request for a grant agreement amendment to HUD (24 CFR 578.11(c)(4). Provisions at 24 CFR 578.105(a)(2), further clarify that:

“...APPROVAL OF SHIFTING FUNDS BETWEEN ACTIVITIES...IS CONTINGENT ON THE CHANGE BEING NECESSARY TO BETTER SERVE ELIGIBLE PERSONS WITHIN THE GEOGRAPHIC AREA AND ENSURING THAT THE PRIORITIES ESTABLISHED UNDER THE NOFA IN WHICH THE GRANT WAS ORIGINALLY AWARDED, OR THE MOST RECENT NOFA, ARE MET.”

Matching Funds

With a UFA designation, all CoC awards continue to have a 25 percent match requirement for all funded costs excluding leasing. This match requirement applies to CoC planning and UFA costs projects as well. The CoC may meet its match requirements using CoC-wide resources, rather than each project meeting the match requirements individually. The UFA is responsible for documenting that the CoC meets its aggregate match obligation of 25 percent.

Annual Performance Reports

HUD requires that every recipient submit an Annual Performance Report (APR) within 90 days of the end of the award period, per 24 CFR 578.103(e). The UFA must submit the APR for all projects funded under its grants. Because funding for all renewal projects is combined in the single renewal project grant, UFAs are not required to submit a separate APR for each project. Currently, recipients submit APRs through the Sage HMIS Reporting Repository. UFAs are required to submit at least one CSV upload in Sage for *each program component and subcomponent* funded for each grant. Program components include:

- Permanent Housing (including the subcomponents of Rapid Re-Housing and Permanent Supportive Housing);
- Transitional Housing;
- Supportive Services Only;
- Homeless Management Information Systems (HMIS); and
- Homelessness Prevention as listed in the CoC Program Interim Rule 24 CFR 578.37(a).

Generally, a UFA should collaborate actively and openly with their CoC to determine the best approach for reporting. Similarly, UFAs must submit at least one APR for each component or subcomponent for new grants.

If any UFA believes it will not be able to meet the 90-day APR submission deadline, it may request an extension for good cause to the local HUD field office. HUD will determine if the request states good cause and if the requested extension date is reasonable.

Renewal of UFA Status and Application

UFA status is not permanently conferred on any organization. By statute, the Collaborative Applicant must re-apply for UFA status in each NOFA funding cycle. The CoC must recertify the Collaborative Applicant to apply for UFA status with each NOFA submission. As with the initial decision to approve application for UFA designation, the CoC should consider this matter at a public meeting held by the CoC with a record of the vote and clear standards regarding voting eligibility. Because HUD does not guarantee renewal of UFA designations, each project in the CoC retains an independent profile in *e-snaps*.

3. What are the Benefits of Obtaining UFA Designation?

A CoC should always carefully consider any major commitments, especially undertaking the transition to a UFA. If the benefits of this change do not outweigh the costs, then the CoC may be better served by not implementing the transition. Listed below are some of the benefits to various CoC stakeholders that may result from adopting the UFA status. Potentially, every UFA can realize these advantages.

COMMUNITY BENEFITS

The CoC and all of its stakeholders are working for the benefit of their entire community. UFA status can benefit the community by:

- Increasing the amount of information available to CoCs for performance measurement and other community wide programs, on an ongoing basis;
- Using reallocation to shift funds across projects outside the competition process to better meet community needs;
- Reducing the reallocation timeframe and resources needed to correct deficiencies and findings in community projects;
- Increasing flexibility to reallocate in response to changed conditions in the local community; and
- Targeting and monitoring funds more effectively and avoiding forfeiting unspent funds.

COLLABORATIVE APPLICANT BENEFITS

UFA status has the most significant impact on the Collaborative Applicant, as the Collaborative Applicant can:

- Implement program and budget changes across projects and even component types;
- May receive additional funding via application for UFA costs to help it carry out its new responsibilities as the UFA; and
- Create a single administrative budget for managing the portfolio of CoC programs.

SUBRECIPIENT BENEFITS

Subrecipients under a UFA may be better able to serve clients and coordinate services, as the UFA permits subrecipients to:

- Speed up the contracting process through a community-wide start date for HUD projects and use of a single contract from HUD; and
- Enhance partnerships among the CoC through implementation of community-wide match for HUD funding under the CoC Program.

CLIENT BENEFITS

The ultimate goal of CoC funding is to end homelessness for those individuals and families experiencing it. UFA status impacts all the projects in the CoC and the clients served. More specifically, clients benefit from:

- Improved transparency and responsiveness to any barriers encountered while receiving services;
- Faster and more nimble recognition of community needs and implementation of projects to meet those needs; and
- Projects that can scale up or down if resources are not being efficiently used or if demand proves higher than expected.

4. What Things Must a CoC Consider Before it Applies to Become a UFA?

The decision to apply for the UFA designation is a CoC decision. While the CoC must have a willing organization to serve as the UFA, it must also have formal permission by the full CoC to authorize the UFA application. Because of the impact of implementing a UFA affects a number of operational components, the CoC should ensure it has considered each area of impact carefully prior to authorizing the UFA application. The following issues should be part of any CoC discussion on becoming a UFA.

GOVERNANCE

A UFA is granted significant authority to distribute and manage funds on behalf of the CoC. Making the decision to become a UFA requires any organizations that are direct recipients of HUD funds to relinquish their direct relationship with HUD and allow the UFA to become the recipient. This alters the relationship that entities have with HUD to one with the UFA. The decision requires the UFA to have a much more direct role in monitoring and enforcing financial management, and holding those entities accountable for project outcome performance. The community should document in its CoC governance charter all requirements and expectations for approving a UFA designation and the roles of the UFA in the CoC. All administrative procedures within the CoC must also meet HUD's expectations. The UFA and CoC must ensure that their processes are inclusive of all the stakeholders in the community, transparent and understandable to multiple audiences, and administered fairly and consistently with every subrecipient. CoCs must document their compliance with these requirements and be prepared to provide the documentation to HUD upon request.

The Act clearly defines HUD's expectations for CoC governance. When being assessed as a potential UFA, the Collaborative Applicant must provide HUD with specific information regarding the CoC structure and governance processes as well as documentation to support the assertions made in the application. Outlined as a questionnaire, Appendix A is a tool to assist communities in assessing their administrative and governance structures. Through this assessment process, a CoC may find gaps that need to be addressed prior to applying for UFA status.

PROJECT MANAGEMENT

The CoC and UFA should also establish guidelines for decisions that the UFA may make in shifting funds between projects, activities, and subrecipients. Prior to applying for UFA status, the CoC should develop or approve a review process for changes to the portfolio of projects awarded by HUD. The CoC should review and incorporate existing Conflict of Interest policies when determining the appropriate process for a UFA.

FINANCIAL MANAGEMENT CAPACITY

The Act specifically requires that the UFA have the capacity to manage all funds awarded to the CoC. This requires that the UFA have both the capacity to manage these awards in compliance with all Federal and HUD-specific accounting standards AND has the ability to ensure that all subrecipients are also in compliance with required standards.

As a tool to assist CoCs in this review, the questionnaire in *Appendix B* will help guide Collaborative Applicants in comparing their current operating systems with federal financial management standards as outlined in the published 2 CFR 200 (*Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards*).

Appendix B frames each financial management element as a question to allow CoCs to easily assess capacity for compliance. An honest review of the issues raised in this questionnaire will give both the Collaborative Applicant and the CoC the opportunity to identify any areas of weakness or non-compliance. For financial management deficiencies, Collaborative Applicants are advised to seek assistance from a financial advisor qualified in federal funds management and HUD requirements.

5. What Process Should our CoC use to Decide to Become a UFA?

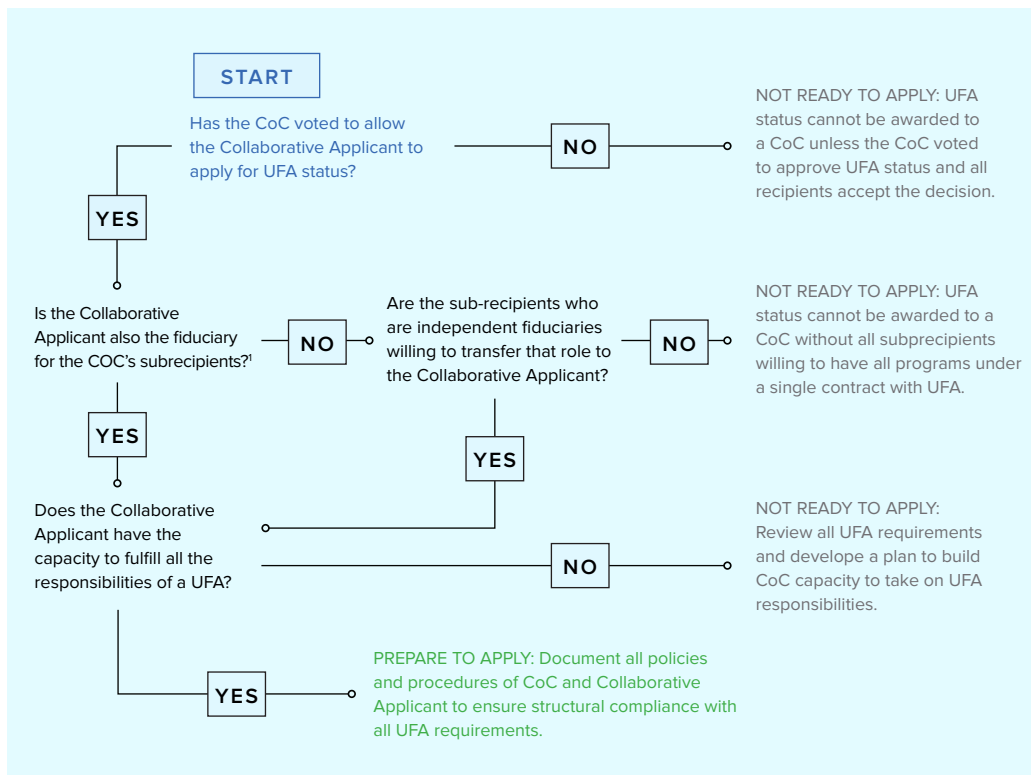
The decision to apply for UFA status must be a CoC-wide decision. In conjunction with the Collaborative Applicant, the CoC should outline a procedure considering an application for UFA status. The decision must be approved prior to the submission of the application by the Collaborative Applicant during the registration phase of the CoC Program competition, or at a time designated by HUD. To ensure full community input prior to the deadline for the registration phase, the CoC should schedule this review well before the registration phase is initiated each year.

Each CoC has its own decision-making process, agreed upon and articulated in the CoC governance charter. The CoC must follow that decision-making process in its deliberations on UFA status. Complete transparency regarding the move to UFA status is important in the implementation of UFA requirements, should HUD award a community with this designation.

Depending on the particulars of the CoC's governance charter, CoCs might consider the following pathway toward a decision:

- Educate all stakeholders on UFA rules and expectations
 - Provide information to all stakeholders in advance of a public process to review and make a decision.
- Form a committee to review issues and make recommendations
 - Review capacity of the Collaborative Applicant.
 - Review implications of UFA status for the community, grant recipients, and program operators.
 - Assess benefits of UFA status and potential impact on the community.
 - Develop recommendations for an operating agreement between the UFA and the CoC.
 - Discuss challenges and rewards with current UFAs. Current UFAs can give prospective UFAs on-the-ground insight on what it takes to earn and maintain UFA status. Contact the SNAPS office at HUD HQ for contact information on current UFAs.
- Conduct a CoC vote per local governance agreement
 - Carefully consider the review committee recommendations, then vote on whether to apply for UFA designation.
 - Incorporate principles for an operating agreement between the UFA and the CoC as part of the same vote.

The following decision tree illustrates a typical pathway that a CoC might follow to determine if the current structure of a CoC makes it eligible for the UFA designation.



¹ While HUD generally expects the Collaborative Applicant to be the fiduciary for all subrecipients there may be times when that is not possible. If there are subrecipients that refuse to allow the Collaborative Applicant to be the fiduciary for all grants in the CoC, the Collaborative Applicant must be prepared to explain to HUD the circumstances and what actions it has taken to address subrecipient's concerns.

After a thorough review of the many requirements and expectations for the UFA, and an assessment that the CoC and its designees have the capacity to fulfill all UFA responsibilities, the CoC should give close consideration to one additional set of questions – i.e., in what ways will UFA status be of benefit to the community, and how will that benefit compare to identifiable costs?

Having a UFA is not necessarily the right designation for all CoCs; nor is it necessarily desirable. While the Act codified the functional requirements for all CoCs, the UFA designation was created as an entirely optional structure.

In addition to determining whether the CoC and Collaborative Applicant have the capacity to fulfill the statutory and regulatory responsibilities of the UFA designation, other key questions a CoC should consider in its deliberations include:

- Will our CoC take advantage of the UFA designation to improve services?
 - The UFA designation allows CoCs to shift funds among and between programs. If the CoC doesn't see a need for these types of shifts, the UFA designation may not provide sufficient benefits to undertake this status.
- Can our CoC fund the additional responsibilities of the UFA designation with or without additional HUD resources?
 - While HUD can contribute funding for UFA activities through the CoC Program competition process, the amount of funding is limited to a maximum of 3 percent of the CoC's total direct costs, or whatever HUD establishes in its annual CoC Program NOFA.
 - UFA cost funding is not guaranteed; costs incurred by the UFA that are over and above UFA funding by HUD may need funding by sources other than CoC funds. It is important to remember that UFA-designated funds can only be used for eligible expenses as described in 24 CFR 578.41(b) and (c). CoCs need to match HUD-funded UFA costs as well.
 - The CoC and Collaborative Applicant should assess any additional costs that may be required for the Collaborative Applicant to fulfill the UFA functions, and then determine if local funding is available to support this additional burden.
- Does the CoC have the leadership capacity to address potential conflicts that may arise from the UFA imposing sanctions on a non-compliant program?
 - HUD assigns monitoring responsibility to the UFA; therefore, the UFA also has the authority to impose sanctions on subrecipients that are not in compliance. Sanctions are detailed in the CoC Program Interim Rule 24 CFR 578.107(a)-(b), and can include shifting funds from the non-compliant program to another subrecipient of the UFA's choosing. The CoC should consider the implications of subsequent community dynamics and make sure that its operating principles for the UFA explicitly address this circumstance. Transparent and consistent application of agreed upon policies will aid the CoC in navigating any potential conflicts among subrecipients.

RESOURCES

CoCs can request Technical Assistance from HUD in considering application for UFA status. To submit a request for Technical Assistance, CoCs should go to the HUD Exchange and submit a request under the topic header: Unified Funding Agency.

For further information on UFA designation, visit <https://www.hudexchange.info/coc/faqs/>. On the left hand side of this page, click on “Program Administration”, and then select “UFA” from the dropdown menu.

Two appendices are attached to this guidance document that should be helpful for CoCs in reviewing associated CoC governance compliance considerations (*Appendix A*) and UFA financial management considerations (*Appendix B*).

CoC GOVERNANCE RESOURCES

CoC Program Toolkit – CoC Responsibilities and Duties – CoC Governance and Structure (<https://www.hudexchange.info/programs/coc/toolkit/responsibilities-and-duties/>)

CoC Program Start Up Training Webinars for FY 2013 Funds (<https://www.hudexchange.info/training-events/courses/coc-program-start-up-training-webinars-for-fy-2013-funds/>)

FINANCIAL MANAGEMENT RESOURCES

2 CFR 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (<https://www.ecfr.gov/cgi-bin/text-idx?SID=5c1da49690c2797965eaef6c12b645b8&mc=true&node=pt2.1.200&rgn=div5>)

Training on 2 CFR 200 from United States Chief Financial Officers Council, the government agency that developed 2 CFR 200 (<https://cfo.gov/cofar/training/>)

Notice: SD-2015-01 issued by HUD February 26, 2015 Subject: Transition to 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Final Guidance (<https://portal.hud.gov/hudportal/documents/huddoc?id=15-01sdn.pdf>)

Financial Management Curriculum: Financial Management 101 (<https://www.hudexchange.info/training-events/financial-management-curriculum/>)

Grants Administration User Guide, April 2013 (<https://www.hudexchange.info/resources/documents/CoCProgramGrantsAdministrationUserGuide.pdf>)

