

Chapter 11: Reporting and Recordkeeping

Introduction

It is important that the grantee fully document compliance with all applicable regulations. This is accomplished through maintaining comprehensive records and submitting all necessary reports.

The filing system should be easy to use and provide a historic account of activities for examination and review by the State, auditors and local staff. All records must be available to the following entities upon request:

- U.S. Department of Housing and Urban Development,
- The Inspector General,
- The General Accounting Office,
- The Comptroller General of the United States,
- Department for Local Government,
- Legislative Research Commission, and
- Auditor of Public Accounts.

These entities must have access to any pertinent books, records, accounts, documents, papers, and other property that is relevant to the grant. Certain records must be available to the public as well. However, grantees must keep files that contain personal information, such as social security numbers, in a secure place. It is important to make note of state and local Freedom of Information laws.

The submission of timely reports is essential for compliance with the Grant Agreement.

11.1 Semi-Annual Reporting

Semi-Annual Progress Reports (formerly Quarterly Grantee Progress Reports) and Contractor/Subcontractor Activity Reports will be used to assess program progress, timeliness and to justify needs. It is important because it provides the Department of Housing (DOH) with information that is required to be provided to the U.S. Department of Housing and Urban Development (HUD). Therefore, both reports must be submitted on time and accurately.

Reporting Period	Due Date
Jan 1 – June 30	July 31
July 1 – December 31	January 31

[Attachment 11-1:
Semi-Annual Progress
Report](#)

[Attachment 11-2:
Contractor/Subcontractor
Activity Report](#)

The twice yearly reporting requirement begins with the first report deadline after the Grantee submits their first draw request and continues until the Grantee has submitted the Final Semi-Annual Report, Final Contractor/Subcontractor, and the Pre-Closeout Certification.

Payment Request will not be processed and no additional funds will be awarded if Semi-Annual Reports are delinquent.

11.2 Labor Standards and Construction Reporting

The Grantee is responsible for submitting all required Labor Standards reports as described in Chapter 9: Labor Standards of this manual and listed below:

- Wage Determination Lock-In Notice
- Copies of Contracts as Awarded
- Notice to Proceed
- Copies of Bonding and Insurance Documentation
- Enforcement Report

11.3 Maintaining Records

Grantees must establish a system for record keeping that assists DOH with the review of files for compliance. In other words, records should be kept in a manner that clearly tells the whole story of a Community Development Block Grant (CDBG) project from beginning to end. **The Grantee is responsible for maintaining all records pertinent to a grant, including supporting documentation, for three years from the date the State closes the program year from which the grant funds were awarded. Because this required record retention period could exceed ten years, the State will notify Grantees when a program year has been closed with HUD and include the end date of the record retention period.**

The list below identifies major file categories, and the materials that should be maintained in each file. This list is not all-inclusive; therefore, refer to applicable laws and regulations as well as the other chapters of this manual for more information.

We also suggest that the following procedural guidelines be considered when designing your filing system:

- Separate files should be maintained for each Small Cities Grant Year;
- Files should be coded for each area of compliance to allow for easier access;
- Responsibility for file-keeping should be delegated to a specific individual to provide consistency;
- Files should be secured at all times;
- Files should be maintained in accordance with the attached Required File Listing. The items listed under each file title are required. Appropriate documentation should be located within that file.

11.3.1 Application File

- Copy of original application
- Assistance Agreement (PEA)
- Authorized Signature for Request for Payment form
- All correspondence/info prior to the signing of the grant agreement, including comments from other state agencies Program revisions (if applicable)
- Approved Financial Plan and Budget (and revisions)

11.3.2 National Objectives

Grantees must maintain records that funded activities meet one of the national objectives. Depending on the objective, the files must contain the specific documentation below. This documentation can also be used in reporting performance measures information.

- Low/Mod Area Benefit
 - Boundaries of service area
 - Census data including total persons and percentage low/mod
 - Evidence area is primarily residential
 - Survey documentation (if applicable)
- Low/Mod Limited Clientele
 - Documentation that the beneficiaries are low/mod or presumed to be low/mod (by category)
 - Low/Mod Housing (see also Housing section below)
 - Income verification of households (using the Section 8 definition) including source documentation
- Low/Mod Job Creation and Retention
 - Number of jobs created or retained
 - Type and title of jobs created or retained
 - Income of persons benefiting from the jobs created or retained
- Slum and Blight
 - Area designation (e.g., boundaries, evidence area meets State slum/blight requirements)
 - Documentation and description of blighted conditions (e.g., photographs, structural surveys, or development plans)
 - If applicable, evidence that the property meets spot designation requirements (e.g., inspections)

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- Urgent Need
 - Documentation of threat to health and safety
 - Documentation of recent origin
 - Certification that other financing resources were unavailable and CDBG had to be used (including ability to borrow, etc.)

11.3.3 Citizen Participation File

- Citizen Participation Plan
- Evidence that citizens were furnished appropriate information (as required in application process)
- Affidavit of the Notices of Public Hearing
- Minutes from the public hearing
- Citizen outreach techniques, including evidence of marketing effort for direct benefit activities such as housing rehabilitation
- Citizen complaints and relevant correspondence (if applicable)

11.3.4 Environmental Review Record (ERR)

For all projects:

- Environmental Review Record Checklist
- Scope of Work for Project/Activity
- Copy of any environmental studies (e. g. archaeological surveys, etc.)
- Copy of all maps and drawings
- Photographs of the project site
- Copy of Request for Release of Funds
- Release of Funds from DOH

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Exempt and CENST Activity Project Classification

- Copy of the Certificate of Exempt/CENST Activity
- Copy of Request for Release of Funds
- Copy of Notice of Release of Funds Notification

Categorically Excluded Projects Subject To

- Copy of Environmental Review for CEST Activity

- Copy of all Consultation letters and responses
- Copy of the Notice of Intent to Request Release of Funds (NOI/RROF) advertisement
- Copy of Floodplain Process documentation (if applicable)
- Copy of Publishers Affidavit for NOI/RRO
- Copy of the RROF Certification
- Copies of any letters received in response to the NOI/RROF
- Copy of Release of Funds Notification from DOH

Assessed Activity Project Classification

- Copy of Environmental Assessment Form
- Copy of Environmental Assessment Checklist
- Photographs of the project site
- Copy of all Agency/Interested Parties Consultation letters
- Written determinations from relevant agencies (SHPO, DEP, Wetlands, etc.)
- Copy of the “Combined Notice of Finding of No Significance”
- Environmental Impact and a Request for Release of Funds
- Copy of Publishers Affidavit for Notice
- Copy of the RROF Certification
- Request for Release of Funds (RROF)
- Release of Funds (ROF)
- Comments received pursuant to the ERR (if applicable)

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11.3.5 Civil Rights

- Documentation of completion of the required Fair Housing Action Steps
- Documentation that the project is designed to redress past discrimination
- A copy of the provisions for nondiscrimination given to developers, contractors, etc.
- Demographic statistics on all beneficiaries and denied applicants of site-specific activities (i.e., housing rehab)
- Documentation of Section 3 certifications from all contractors and subcontractors.
- Documentation that contractors complied with the Civil Rights requirements as explained at the pre-construction conference

- Fair Housing Strategy
- Documentation of all other efforts to further local fair housing and opportunity
- Documentation of compliance with the requirements under Section 504 of the Rehabilitation Act of 1973, as amended

11.3.6 Financial

- Copies of all Vendor Invoices
- Cash Receipts Journal
- Cash Disbursement Journal
- General Ledger
- Property Management Register
- Subsidiary Ledger on Rehabilitation Loans
- Journal Entry Voucher (optional)
- Federal Cash Control Register (optional)
- Expenditure Summary Report (optional)

11.3.7 Procurement

All Procurements utilizing CDBG funds:

- Documentation of Cost Reasonableness Estimate for all procurements

Supplies/Materials

- Copy of Request for Quotation (RFQ) (email, telephone notes, etc.)
- Documentation of Notice to DAS for M/WBE participation
- Documentation of all quotes received
- Justification of selection

Professional Services

- Copy of the Request for Proposal (RFP) or Request for Qualifications (RFQ)
- Copy of the RFP/RFQ newspaper advertisement
- Documentation of notification to DAS for M/WBE participation

- List of companies who submitted Statements of Qualifications or Proposals
- RFP/RFQ evaluation and scoring documents
- List of short-listed firms and documentation of interview process
- Short-listed firms evaluation and scoring documents
- Justification for selection of contractor

Construction and Related Services

- Copy of Invitation for Bid (IFB)
- Copy of IFB newspaper advertisement
- Certified mail receipts from MBE/WBE firms
- Minutes from public meeting where IFB's were opened
- Copy of the bid tabulation sheet, certified by the project architect/engineer
- Justification of selection

11.3.8 Contract Development

Professional Services

- Copy of Contract with the required federal contract provisions (outlined in the DOH Assistance Agreement)
- Disclosure Report for each contract

Construction – Related Services

- Copy of Contract with the required federal contract provisions (outlined in the DOH Assistance Agreement)
- Copy of the Bid Guarantee
- Copy of the Performance Bond
- Copy of the Payment Bond
- Copy of contractor(s) insurance policy
- Disclosure Report for each contract
- Proof of the established Retainage Account (if applicable)
- Documentation on all Change Orders

11.3.9 Payment File

- Copies of all Contractor/Consultant Invoices
- Copies of Payment Requests in Chronological order
- Approved Cost Summary (and revisions)
- Authorized Signature for Request for Payment form
- Original Project Expenditure Account Agreement

11.3.10 Audit File

- Copy of Audit Reports
- Responses to Audit Findings (if applicable)
- Copy of DOH Acceptance or Disapproval letter
- Grantees response to DOH findings (applicable if audit was disapproved by DOH)
- Request for Proposal (RFP) for auditing firm

11.3.11 Acquisition and Relocation Files

Acquisition

A separate file must be maintained for each property acquired and must include:

- Property owner name and address
- Address of property to be acquired
- Copy of market estimate on property valued under \$10,000.00
- Copy of Appraiser's identification Card (when applicable)
- Preliminary Acquisition Notice to Owner Invitation to the owner to accompany appraiser Appraisal Reports
- Review of Appraisal
- Copy of written purchase offer
- Purchase agreement
- Copy of donation/waiver forms (if applicable)
- The deed to the property to be acquired

Relocation

A separate file must be maintained for each household relocated and must include:

- A household survey, which should include the names, ages and demographic information of the household to be relocated
- A description of the nature of the advisory services offered, including the dates they were offered and any brochures or pamphlets explaining their rights
- Evidence of correspondence concerning the rights and payments available to displaced persons
- 90day advance Relocation Notice (and evidence of delivery)
- 30day Displacement Notice (and evidence of delivery) Evidence of at least three referrals to comparable units Inspection report on referral units
- Documentation on the type of payment made
- Evidence that payment was made (canceled check or the like)

11.3.12 Labor Standards

- Copy of Wage Determination Assignment Notice
- Copy of Wage Determination Lock-in Notice
- Justification of Wage Determination effective other than bid opening (if applicable)
- Copy of Invitation for Bid
- Copy of Publishers Affidavit for IFB
- Copy of construction plans and specifications with appropriate labor standards documentation attached
- Copy of Pre-Bid Conference Sign-in sheet (if applicable)
- Copy of the Contractor/Subcontractor Verification form
- Copy of the Notice of Contract Award
- Copy of the construction-related contract(s) with the HUD 4010 form and Federal Construction Contract Provisions referenced or attached
- Copy of the Preconstruction Conference Notes
- Copy of contractor(s) fringe benefit programs
- Copy of any apprenticeship certification programs, if applicable
- Copy of Contractor(s) Certification form

- Copy of Subcontractor(s) Certification forms, if applicable
- Copy of all weekly certified payroll reports for contractor(s)/subcontractor(s)
- Copy of all employee interviews
- Documentation of any wage deficiencies and copies of restitution payments (if applicable)
- Copy of the Final Inspection/Project Completion report

11.3.13 Contractor File

- Copies of Payment Requests in Chronological order
- Original Project Expenditure Account Agreement

11.3.14 Reporting File

- Semi-Annual Progress Reports
- Semi-Annual Contractor/Subcontractor Activity Report

11.3.15 Monitoring File

- Construction Closeout Checklist
- Construction Closeout Certification
- Project At-a-Glance Worksheet (as applicable)
- DOH monitoring letters
- Evidence of corrective actions in relation to DOH findings (if applicable)
- Certificate of Completion

[Attachment 12-6: Project At-a-Glance Worksheet - Housing Rehab](#)
and
[Attachment 12-7: Project at-a-Glance Worksheet - Public Housing \(under construction\)](#)

11.3.16 Housing Rehab Files

- See Appendix I: File Checklist in the CDBG Residential Rehab Standards Manual in [Chapter 7: Housing Rehabilitation](#) of this Manual.

[7-28: CDBG Residential Rehab Standards](#)