As outlined in Section 4 of the **Disaster Recovery CDBG Grantee Administrative Manual**,the grantee must maintain all program documentation such as financial records, supporting documents, and statistical records. These records must be retained for a period of five years after close-out of the federal grant related to the activity and/or contract. OCD-DRU may monitor these records during the retainage period.

The filing system established to keep core records should be separate of individual project files and easy to use while providing a historical account of activities for examination and review by the OCD-DRU, auditors, and local grantee staff. DR- CDBG records are subject to the Freedom of Information Act and relevant state laws regarding public availability. Files should, to the extent possible, be maintained in a central location. Although a consultant may maintain a set of files, the grantees are required to maintain the original files at their location.

The list below is a sample of the major file categories that should be maintained and a listing of materials that should be kept in each file. This list is not all inclusive and some documents may not be applicable.

|  |
| --- |
| **Grant Approval *(Refer to Manual Section 1 and Section 2)*** |
| Letter from the OCD-DRU awarding grant  Grantee CEA Agreement and any Amendments  Plan/Proposal and any Plan/Proposal Amendments  Records of correspondence concerning other contract conditions |
| **Policies and Procedures *(Refer to Manual Section 2, Section 4, Section 5, Section 6, and Section 12)*** |
| Duplication of Benefits Policy  Procurement Policies and Procedures  Contract Administration Policies and Procedures  Financial Management Policies and Procedures  Monitoring Policies and Procedures  Record Keeping Policies and Procedures |
| **Citizen Participation *(Refer to Manual Section 2)*** |
| Copy of all notices of public hearings held and proofs of publication relating to the DR-CDBG program  List of persons attending public hearings and minutes of the meetings  Citizen inquiries and complaints and correspondence responding to the inquiries and complaints  Copy of Citizen Participation Plan with adopting resolution  Records documenting implementation and compliance with the Citizen Participation Plan  Citizen Complaint Procedures |
| **Civil Rights *(Refer to Manual Section 8)*** |
| Section 3 of the HUD Act of 1968  Section 3 of the HUD Act of 1968 Complaint Form  Fair Housing activity (incl. Utility Bill Stuffer and a Fair Housing flyer)  Section 3 of the HUD Act of 1968 Employment activity  Section 3 of the HUD Act of 1968 Contracting activity  Equal Opportunity  Equal Opportunity Records  Employment and Training, Construction and Non-construction Report  Section 504  Self-evaluation with all areas examined  List of interested persons consulted |
| **Financial Management *(Refer to Manual Section 5)*** |
| Authorized Signature Form  Financial Management Questionnaire (mailed with “Application Revision Letter”)  Electronic Funds Transfer Enrollment Form  Process to Change forms  Requests for Payment  General-purpose Financial Statements (Statement Of Revenues, Expenditures And Changes In Fund Balance And A Balance Sheet)  Record of commitment of other funds  Source documentation (contracts, purchase orders, vouchers, invoices, requests for partial payment, etc.)  Support documentation (canceled checks, deposit slips, monthly bank statements, etc.)  Grantee Code of Ethics  Grantee audits |
| **Audit *(Refer to Manual Section 5*** ***and Section 6)*** |
| Method utilized to procure audit firm(s)  Professional Services Agreement with independent CPA (“written engagement agreement”)  Financial Reports  Information relating to Financial Reports costs  Data collection Form and Reporting Package  Financial Reports required if Single Audit is not done  Annual sworn financial statements if revenue received was $50,000 or less,  An annual compilation if revenue received was more than $50,000 but less than $200,000,  An annual review to be accompanied by an attestation report, if revenue received was $200,000 or more but less than $500,000, or  An annual audit if revenue received was $500,000 or more.  Independent Audit Results, Support Documentation, and Corrective Actions  Force Account, if required  Contact the OCD-DRU for record keeping requirements with respect to force account. |
| **State Monitoring *(Refer to Manual Section 12 and Section 13)*** |
| State letter(s) of findings  Grantee response to letter of findings  State's response clearing findings  Other correspondence related to the OCD-DRU’s monitoring visits  Grantee/CEA Final Performance Report (Exhibit 13-4a)  Housing Opportunities Form (Exhibit 13-4b)  Final Project Close-out letter from OCD-DRU |
| **General Correspondence** |
| Incoming and outgoing correspondence that does not fall into the above categories or into a specific  project file category |