

RECORD-KEEPING CHECKLIST FOR HOUSING SUSTAINABILITY PROGRAM

CDBG Owner Occupied Housing Sustainability recipients must demonstrate compliance with applicable requirements. IEDA will monitor recipients and activities for full compliance. The recipient should establish a filing system to provide a historic record of all activities. Files should be established for all contracts. Files must be maintained for five years after contract expiration. Files should be made for each major category shown below, as applicable, with sub-files as needed. Documents submitted to IEDA should be done through iowagrants.gov with recipients maintaining original documents in their project file.

General Administration Files

I. CDBG Housing Application

Completed application

Amendments and revisions to the application if any

Correspondence about the application

II. Agreement with IEDA

Award letter

Signed contract (and all components), requests for amendments, approved amendments, and documentation supporting requests to amend activities or transfer funds and budget revision requests (including security instruments)

Requests for funds

Other applicable reports and supporting documentation

III. Financial Management

Chart of accounts

Accounting procedures

Accounting books of original and final entry

Source documentation (e.g., purchase orders, invoices, contracts, budget transfer memoranda, time records)

Lending institution records (e.g., canceled checks, deposit slips, bank statements)

Procurement records (i.e., rationale for method of procurement, procurement policy, selection of contract type, advertisements, notification of bidding and basis of cost)

Contractor payment control record

Property inventory file listing any real or personal property acquired with Housing Fund assistance, as applicable and allowable

IV. Contract Transactions (may be included as part of project/activity files)

Original recipient contracts with service providers

Iowa Department of Public Health registration number for each contractor (or social security numbers for individuals on contract)

Contractor clearances

V. Monitoring/Inspection

Monitoring follow-up letters

IEDA letters of findings and recommendations

Response to letters of findings

Evidence clearing any monitoring findings

VI. Audit (local governments and non-profits) (If applicable, see the amended Single Audit Act of 1996)

Audit firm procurement documentation

Hiring letter to audit firm

Audit report

Correspondence regarding findings

VII. Closeout

Any final reports

Closeout letter from IEDA and response

VIII. General Correspondence

All correspondence received and sent, that does not fall into one of the above project file categories, including, for local governments, comments received by the recipient on the project from citizens and the recipient's response to these comments.

IX. General Complaints/Disputes

Correspondence from local residents, government officials and/or media representatives, expressing dissatisfaction with the project; and the recipient's response to complaints. Document non-written complaints (e.g., telephone calls) with internal notes to the file.

General Compliance Files

I. Environmental Review Record

Environmental assessment

Copies of published notices

Copy of Request for Release of Funds (HUD Form 7015.15)

Letter from IEDA releasing funds

Section 106 approval from IEDA

Documentation of compliance with Environmental Clearance Worksheets

Copies of citizen comments made on the environmental assessment

II. Equal Opportunity/Civil Rights

Community profile

Racial, ethnic and gender data showing the extent to which these categories of persons have participated in, or benefited from, Housing Fund activities

Documentation of all affirmative actions taken to achieve fair housing, including a local fair housing ordinance, if available

Evidence of attempts to identify and solicit minority contractors and vendors, including records of all contracts and subcontracts (by number and dollar amount) awarded to minority business and women's business enterprises

Documentation of compliance with Section 3 requirements, as applicable to the project (Refer to Chapter 8/ Appendix 8 of the CDBG Management Guide)

Copy of local equal opportunity policy and/or affirmative action plan (i.e., local governments with 15 or more FTEs) and data which records affirmative action in employment

Project Administration Files

Records should be maintained according to individual projects and should include the following:

I. General project administration documents, including policies, procedures, standards, and other information of general project interest.

II. Professional or technical services procurement and contracts

III. Management control records

Where recipients are responsible for implementing a number of similar activities, such as owner-occupied rehabilitation, an ongoing composite record of current status/progress should be maintained for all similar projects. The management control record should identify major tasks accomplished, to date, for all individual projects. Ethnic/racial data should also be maintained.

Individual Project Files

Individual project files should contain a complete record of all project activities. Each project should have its own file. Within each file there should be documentation to record the chronological history of the project. Project files should include, where applicable, the following items.

I. Individual Project Files

Completed formal application (and pre-application if used)

Income and asset documentation of applicant(s)

Verification of income and assets and all forms used for verification

Verification of the homeowner's OR household member's elderly (60+) OR "Severely Disabled" status (Architectural Barrier Removal Program ONLY)

Verification of ownership and primary place of residence

Eligibility determination documentation

Demographic data (i.e., family size, minority, disability, female head-of-household, age, etc.)

Determination of type(s) and amount(s) of assistance

Initial inspection (signed or initialed, and dated) (For Exterior Home Improvements and Energy Efficiency Improvements Programs ONLY)

Needs Assessment (signed or initialed, and dated) showing what is required for the homeowner or household member to have completed to remain residing in the home. (For Architectural Barrier Removal Program ONLY)

Energy Audit (Energy Efficiency Improvements Program ONLY)

Work write-up and/or project specifications

The CDBG Home Energy Efficiency Eligible Activities Checklist (Energy Efficiency Improvements Program ONLY)

Staff cost estimate

Lead hazards identification and all notices (as applicable)

Revision to specifications (as applicable for lead safe housing)

Copies of all bids and/or bid tabulation sheet (should include all bid documents such as notification of hearing and letting.)

Letter of award to lowest responsible bidding contractor

Letters of non-award to other contractors

Executed copy of contract

Permits, insurance

All change orders

Record of interim inspections

Payment(s) record

Clearance testing documentation (as applicable)

Final inspection(s)

Completion certificate(s) and owner acceptance of work

Complete and recorded repayment agreement (mortgage and/or security note)

Lien waivers (including partial lien waivers)

Warranties or guarantees

II. Professional or Technical Services Procurement

List of firms/individuals solicited

Written request for proposals or qualifications for professional services (if secured by competitive negotiation), specifying the work to be done

Evaluation criteria/review process

Publicized notice

Denial/award letters

Minutes of the meeting(s) at which the contract was awarded

Copies of contracts

III. Construction Contract

Copy of bid advertisement

Copy of bid package

Project specifications

Statement of terms and conditions

Contractor and subcontractor certification forms

Bid, performance and other bond requirements

Construction contract procurement and award

Minutes of the bid opening meeting

Log of bid package recipients and bidders

Bid tabulation

Check for contractor debarment/Iowa registration

Documentation of Single Source approval from IEDA. (if applicable)

Copy of contract must include the same items as the bid package with completed forms

Pre-construction conference report or minutes

Copy of notice of contract award

Notice to contractor to proceed with the work

Contractor performance records.

Reports on job site inspections

Log of payments made to contractor

Records of contractor violations (if applicable)

Notice of contractor violation

Record of resolution