

# SECTION 3 – RECORD KEEPING AND REPORTING

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<b>TABLE OF CONTENTS</b>	<b>PAGE</b>
Overview .....	3-1
Reporting Requirements.....	3-1
Establishing a CDBG Filing System .....	3-1
Sample Filing Structure .....	3-2
A. Application File.....	3-2
B. CDBG Grant Contract File.....	3-2
C. Environmental Review Record File .....	3-2
D. Financial Management File .....	3-3
E. Procurement and Bonding File .....	3-3
F. Labor Standards and Construction Contract File.....	3-4
G. Civil Rights File .....	3-4
H. Required Reports Summary File .....	3-4
I. Subrecipients/Partnership File .....	3-4
J. Acquisition File.....	3-5
K. Relocation File.....	3-5
L. Property Management File .....	3-5
M. Housing Rehabilitation File .....	3-5

**OVERVIEW**

As a CDBG grant recipient, you must be able to document compliance with state and federal regulations. Good record keeping and reporting systems are essential. This section provides guidance on establishing your CDBG filing system and a summary of required grant reports.

**REPORTING REQUIREMENTS**

The following reports are required as part of contract compliance by the Grantee.

Report/Form	Annually	Reporting Period	Due Date	Section/ Attachment
Contract/Subcontract Activity Form	<input checked="" type="checkbox"/>	October 1-September 30	<b>October 31</b>	Attachment 7-J
Program Income Reports	<input checked="" type="checkbox"/>	January 1 – December 31	<b>February 15</b>	Attachment 4-A
Section 3 Summary Report	<input checked="" type="checkbox"/>	July 1-June 30	<b>August 31</b>	Attachment 7-G
Beneficiary Report				
<ul style="list-style-type: none"> <li>• Public Services Grant</li> <li>• Local Assistance Programs</li> </ul>	<input type="checkbox"/>	Quarterly	<b>30 days after quarter</b>	Attachment 4-H
	<input checked="" type="checkbox"/>	July 1-June 30	<b>July 30</b>	Attachment 4-D

CDBG staff will notify grantees of the due dates as well as provide forms and instructions for the reporting period. Failure to submit required reports, on time, may result in contract payments being withheld.

**ESTABLISHING A CDBG FILING SYSTEM**

You must maintain good, accurate and up-to-date files. If program responsibilities are performed by a subrecipient, all of the required files must still be maintained by the grantee.

**Security:** CDBG files should be kept in a secure place, but accessible to the public. A lockable filing cabinet and a check-out system is recommended for paper files. A back-up storage system is recommended for electronic files.

**Maintaining a Filing System:** Grantees will need to maintain the CDBG files for a minimum of six years after final closeout of the CDBG grant.

**Organizing a Filing System:** A good filing system can be an effective management tool. It will also simplify monitoring by CDBG staff and ensure that you have all the necessary documentation to meet compliance requirements.

**SAMPLE FILING STRUCTURE**

Below is a basic guide for your CDBG record keeping. The file structure is comprehensive and not all sections apply to your project.

**A. Application File**

- Full CDBG application
- Public hearings documentation (notice, notice distribution list, attendance list, minutes)
- Correspondence and documentation pertaining to the application
- Benefit data (support material), beneficiary and low-moderate income backup documentation, the original surveys and analysis of survey results
- Grievances received and resolution documentation
- Title VI Certification

**B. CDBG Grant Contract File**

- Award Letter or Incur Cost Letter, as applicable
- Executed CDBG contract
- Letter documenting satisfaction of special conditions, if any
- Letter of approval of actions to satisfy special conditions and/or removal of special conditions
- Residential Anti-Displacement and Relocation Assistance Plan
- Excessive Force Policy (Attachment 1-C)
- Greenhouse Gas Emissions Reduction Policy (capital projects only)
- Amendment requests, if any

**C. Environmental Review Record File**

- Evidence of compliance with SEPA
- Applicable NEPA environmental checklists
- Section 106 of the National Historic Preservation Act including documentation of tribal consultation
- Evidence of compliance with federal environmental laws and regulations
- Published notices of Environmental Findings and Intent to Request Release of Funds
- Comments received and responses
- Request for Release of Funds
- Release of Funds letter (from Commerce)

D. Financial Management File

- Program budget (from contract) and any projects or activity budgets
- Request for payment (Washington State Invoice Voucher form, A-19)
- Project Status Report
- Reportable Expenses Report
- Record of commitment of other funds
- Record of expenditures of CDBG and other funds
- Program Income Report, if applicable
- Evidence of bonding
- Invoices
- If using an indirect cost rate to allocate administrative costs, a copy of the approved indirect cost allocation plan (also submitted to Commerce)
- Copies of timesheets for CDBG-funded staff
- Other source documents
- Bank account/statements
- Deposit slips
- Other banking records

E. Procurement and Bonding File (one file for each procurement process)

- Written Standards of Conduct
- If there is a conflict of interest, records pertaining to the conflict and documentation regarding how the issue is resolved
- Record of exclusion report from SAM.gov (verified **prior** to contract award)
- MWBE firms solicited or documentation of posting on OMWBE website
- Executed agreement/contract between the jurisdiction and vendor

<b>Professional Services Procurement</b>	<b>Construction Procurement</b>
<ul style="list-style-type: none"> <li>• RFQ/RFP Affidavit of Publication</li> <li>• Selection process and results</li> <li>• Performance reports from the consultant</li> </ul>	<ul style="list-style-type: none"> <li>• Invitation For Bid affidavit of publication</li> <li>• Plan holder list</li> <li>• Bid tabulation sheet</li> <li>• Bid document(s)</li> </ul>

F. Labor Standards and Construction Contract Files

- Preconstruction conference minutes, if conducted
- Notice of Contract Award and Start of Construction form
- Wage rate determinations, both state and federal, in effect as of 10-day wage check
- Contract and subcontract activity form
- Inspection reports

**Labor File (one file for each contractor/subcontractor)**

- Summary sheets for payroll review and employee interviews
- Certification of Bidder and/or Subcontractor required by Executive Order 11246 (Attachment 7-B and 7-C)
- Section 3 Plan (Attachments 7-D, 7-E, 7-F, and 7-G)
- Employee interviews (Attachment 8-G)
- Weekly certified payrolls
- Fringe benefit documentation
- Request for additional classification(s), as applicable

G. Civil Rights File

- EEO-4 form (Attachment 10-G)
- Title VI Certification (submitted with grant application)
- Fair Housing Resolution
- Documentation of how and when the Fair Housing Resolution was published
- Documentation of additional efforts required to satisfy fair housing requirements
- ADA/504 self-evaluation
- Documentation of additional information to satisfy ADA/504 requirements

H. Required Reports Summary File

- Contract and Subcontract Activity Form
- Program Income Form, as applicable
- Section 3 Summary Report
- Beneficiary Report(s), as required

I. Subrecipients/Partnership File (one file for each organization)

- Subrecipient or Partnership agreement
- Record of exclusion report from SAM.gov prior to contract award
- Subrecipient's written Standards of Conduct
- Subrecipient's ADA/504 self-evaluation
- Other ADA/504 documentation, as required
- Federal audit, if applicable
- Deed of Trust, if applicable

**J. Acquisition File**

- Preliminary acquisition notice
- Evidence of invitation to accompany appraiser
- Appraisal report
- Written statement of just compensation
- Written offer to purchase
- Receipt for purchase price
- If donation, waiver
- If acquisition is terminated, notice of intent not to acquire

**K. Relocation File**

- Notice of displacement or notice to continue occupancy
- Evidence of receipt of either notice
- Copy of household survey of housing need
- Copy of 90-day and 30-day notices
- Evidence of receipt of notices
- Evidence of referrals to replacement housing
- Unit inspection records
- Copy of each relocation claim with supporting documentation
- Verification of claim
- Appeal, if filed, and disposition
- Correspondence
- Other data, materials
- If relocation is not complete within six months of notice of displacement, explanation of delay and plan for timely completion
- Record of displaced households by race

**L. Property Management File**

- Records of acquisition of nonexpendable personal property
- CDBG Property Inventory
- CDBG approval for purchases over \$300
- Records of disposition of property

**M. Housing Rehabilitation File**

- Housing Program Policies and Procedures (includes side service connections)
- Individual case files (one for each household that applies for assistance)
- Annual Beneficiary Reports (Attachment 4-D)