Recordkeeping

Recordkeeping is at the heart of demonstrating compliance with <u>all</u> requirements. Generally speaking, if it isn't documented in either digital or hard copy format, it didn't happen. Grantees with sound recordkeeping practices throughout the life cycle of their award tend to be more successful at the time of a monitoring.

👍 Do's

- ✓ Use file checklists and be organized
- ✓ Create a uniform file naming convention and folder structure
- ✓ Create folders early and update often
- ✓ Restrict access to authorized users
- ✓ Remove duplicate or obsolete files
- ✓ Protect Personally Identifiable Information (PII)

👎 Don'ts

- ✖ Assume the file is stored
- ✖ Wait until the end to assembles files
- ✖ Store documents in email or personal folders, or on desktop etc.
- ✖ Transmit or store files, via unsecure methods or locations
- ✖ Forget records related to labor standards, environmental, FHEO, etc.

The Five Ws of Record Management

Always consider the following when determining what records should be maintained:

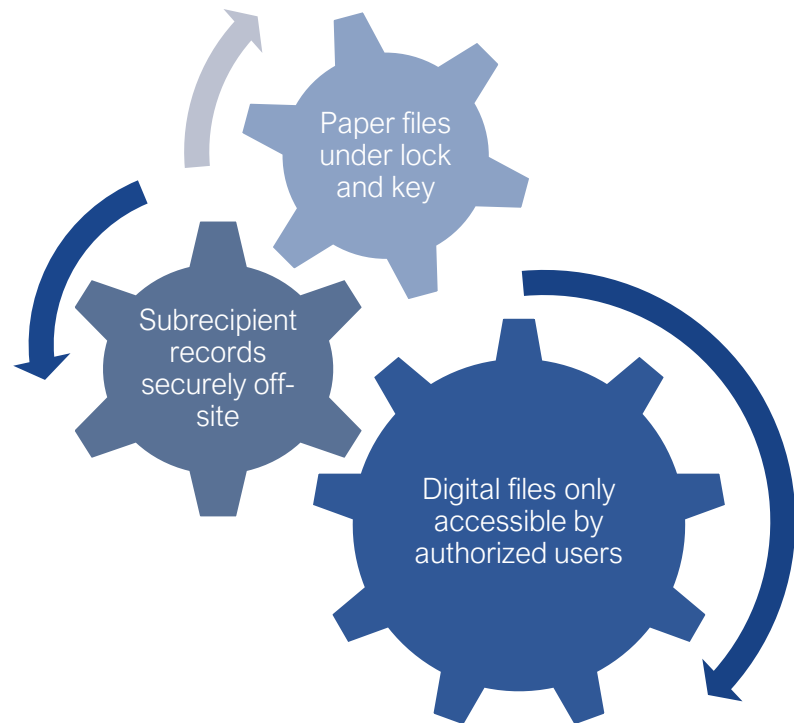|	Project Records	Financial Records
Who	• Is the project serving? • Is implementing the project?	• Provided the good or service? • Approved the payment?
What	• Is the eligible CDBG activity? • Is being provided to beneficiaries?	• Is the good or service purchased? • Is the purpose of the expenditure?
Where	• Is the project/service located? • Is the service area (area benefit)?	• Were the services rendered? • Is the good stored/inventoried?
When	• Does the project start and end? • Was the beneficiary provided a service?	• Was the purchase made? • Was the cost incurred and invoice approved?
Why	• Was a particular decision made? • Was the project funded?	• Was the vendor selected? • Was a good selected over another?

Record Locations

Records should be kept in secure, proper, and accessible locations. Hard copy files should be maintained under lock and key. Digital files should be stored in location that may only be accessed by authorized staff.

Policies and procedures should govern the location of and access to records.

If records will be stored in more than one location, the location of each type of record should be clearly delineated in the policies and procedures.

Safeguards to protect PII must be in place and adhered to.

Paper files under lock and key

Subrecipient records securely off-site

Digital files only accessible by authorized users

Accessibility

Grantee's records must be accessible to the stakeholders below upon request:

Local Grantee Staff	Authorized Grantee staff responsible for implementing the CDBG-CV funded project must have access to applicable records
Subrecipient Staff	Likewise, authorized Subrecipient staff must have access to applicable records, and Grantee staff must have access to Subrecipient records
HCD/State Agencies	HCD and other state agencies must have access to all Grantee and Subrecipient records for audit and monitoring
HUD/Federal Agencies	Likewise, HUD and other federal agencies must have access to all Grantee/Subrecipient records for audit and monitoring
The Public	The Public is entitled to access to program guidelines and application materials, as well as environmental records and other records subject to the Freedom of Information Act (FOIA)