



*The GLO-CDR Implementation Manual provides guidance for CDBG-DR and CDBG-MIT subrecipients and should not be construed as exhaustive instructions.*

# CHAPTER 3—RECORDKEEPING & REPORTING

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## **CHAPTER 3—RECORDKEEPING & REPORTING**

### **3.1 Reporting**

Accurate recordkeeping is crucial to the successful management of CDBG-DR and CDBG-MIT funded activities. Insufficient documentation could lead to monitoring findings and repayment of funds.

All required documentation associated with a project or activity should tell a complete story of project eligibility, from application to closeout. Subrecipients will report all required data into the GLO system of record as instructed. Subrecipients must also maintain a full and current set of all program related documents at their primary office location and available upon request.

CDBG-DR and CDBG-MIT subrecipients are also required to submit a Monthly Status Report as detailed in the Subrecipient Agreement or by the request of the Grant Manager. Reports should be submitted to GLO-CDR in a timely manner as requested by the GLO or by the requirements established in the Subrecipient's Agreement.

### **3.2 Establish a Record-Keeping System**

Subrecipients are the Responsible Entity for all Subrecipient Agreement-related activities and must maintain all CDBG-DR and CDBG-MIT files on-site at the subrecipient's customary place of business (e.g., city hall, county courthouse, main office) and be available for review upon request by HUD, GLO staff, or other entities. Subrecipients must be familiar with and adhere to all regulations of the Public Information Act as appropriate.

<https://comptroller.texas.gov/about/policies/open-records/public-information-act.php>

Subrecipients must establish a record-keeping system to document compliance with all federal, state, local, and program requirements. Subrecipients must document and clearly define all processes for acquiring, organizing, storing, retrieving, and reporting information about CDBG-DR and CDBG-MIT funded activities. This documentation could be incorporated into Standard Operating Procedures (SOPs), policy manuals, or other guidance documents. Subrecipients should not delegate recordkeeping as retention requirements are specific to the subrecipient. Consideration to physical records should include:

- Where are the items stored;
- Are the records at risk of destruction;
- What identifies the records to be kept for the required record-keeping period.

If using electronic records, the subrecipient must have ownership of the records and be able to access the information long term. It is important to specify person(s) responsible for records management



and reporting. The person(s) responsible for these tasks must be properly trained for this responsibility; subrecipient policies and procedures must include processes that ensure recordkeeping consistency and training. When using electronic record-keeping systems, the subrecipient should consider a contingency plan for data disaster recovery as well as access to those records when there is a change in staff.

### **3.3 Recordkeeping—Technical Assistance**

GLO-CDR is available to provide technical assistance throughout the life of the Subrecipient Agreement to ensure compliance and eligibility. Technical assistance may include:

- Email correspondence;
- Individual and conference phone calls; and/or
- On-site visits and meetings.

Documentation of any Technical Assistance provided must be included in the subrecipient's program record-keeping files.

### **3.4 Files to Maintain**

Although the specific documentation maintained may vary depending on the type of project or activity (infrastructure, housing, economic revitalization, etc.), subrecipients are required to maintain comprehensive, up-to-date project files. The files should cover all aspects of the project, beginning with application and eligibility and ending with program closure.

When assigning project responsibilities, each subrecipient should carefully assess the duties identified in this guide to determine their staff's capacity to administer and report for this Subrecipient Agreement (e.g., Force Account labor). Should the subrecipient determine that they need assistance to complete the tasks, grant administration service fees are an eligible activity. In either case, grant administration funds are often subject to caps that will be defined in the associated governing documents.

If the subrecipient chooses to procure for grant administration services, the subrecipient must follow all 2 CFR 200 procurement regulations (see Chapter 5 of this Manual) and clearly differentiate the tasks to be completed by the subrecipient from those assigned to the vendor. Clear separation of duties is essential to establish expectations and avoid duplication of effort.

Accurate recordkeeping is necessary to ensure that all documentation for each of the duties identified is compliant with federal, state, local, and program requirements. In brief, every file must fully tell the story of the Subrecipient Agreement/project from application to completion to ensure success in the inevitable audits that will come.



For reference purposes, a sample Infrastructure File Review Checklist is provided at the end of this chapter (see [Section 3.6](#) below). The Infrastructure File Review Checklist provides the basic outline of the documentation subrecipients must maintain on-site. The order of the documentation can be at the subrecipient's discretion, as long as it is arranged in a manner where the files can be efficiently audited. To facilitate audits, it is highly recommended that subrecipients include a Table of Contents for their CDBG-DR and CDBG-MIT files that identifies where documents can be found (e.g., "Box 1", "Filing Cabinet A, Drawer 2") and/or a clear explanation of the electronic filing system and how to access that data. Whether or not using the optional guide, each listed item must be addressed in the local filing system, even if to indicate the task is not appropriate/applicable to the situation.

The following list outlines some, but not necessarily all, key topics and categories the subrecipient should include when developing a project file structure. These categories below are not prescriptive or all inclusive. For additional assistance, please contact your Grant Manager.

#### Subrecipient Information

- Organizational chart;
- Final approved application for funding;
- Complete and signed Request for Federal Funding SF-424;
- Executed Subrecipient Agreement, amendments, revisions, and/or Technical and Guidance Letters.

#### General Administrative Records

- Personnel files, if applicable;
- GLO monitoring correspondence;
- Pass-through entity agreements; and
- Pass-through entity monitoring.

#### Civil Rights, Fair Housing, EEO, Citizen Participation

- Citizen participation compliance documentation;
- Complaint policies and procedures;
- Fair Housing and Equal Opportunity records;
- Documentation of compliance with crosscutting requirements (e.g., Davis-Bacon, Uniform Relocation Act, and Lead-Based Paint);
- Limited English Proficiency documentation;
- Outreach performed to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible; and
- Job Creation/Retention reports.



### Internal Financial Records

- Financial policies and procedures;
- Budget;
- Accounting journals, ledgers & chart of accounts;
- Financial Source documentation (purchase orders, invoices, canceled checks);
- Real property & equipment inventory documentation;
- Draw requests and backup documentation;
- Financial reports;
- Audit reports and documentation; and
- Relevant financial correspondence.

### Environmental

- Complete Environmental review records to include:
  - Public notices/publisher's affidavit;
  - Coordination letters for/from other agencies;
  - Public comments;
  - Request for Release of Funds and Certification form;
  - Authority to Use Grant Funds form;
  - Documentation of compliance with other applicable laws/authorities;
  - Flood plain maps as necessary;
  - Texas Historical Commission notification and response letters as appropriate; and
  - Other documentation identified by HUD or GLO Environmental staff.
- Environmental re-evaluations (if necessary).
- If applicable; Environmental exemption form titled "Exemption Determination for Activities Listed at 24 CFR 58.34" along with required 58.6 Compliance Checklist.

### Procurement and Draw Requests

- Procurement policies and procedures;
- Procurement of professional services files (advertisements, proposals/qualifications, contracts, etc.);
- Procurement of construction files (advertisements, bids, scoring, notice of award, contracts, etc.);
- Bid rejection documentation;
- Bank account records (including program income records, if applicable);
- Draw requests;
- Original invoices;
- Meeting Minutes for invoice payment approval;
- Copies of payments;
- Human Resources Employee Personnel Records;
- Timesheets;



- Benefit Rates for employees; and
- Payroll records and reports.

#### Reporting and Recordkeeping

- Local policies and procedures;
- Project/activity status;
- Project/activity eligibility and national objective;
- Characteristics and location of the beneficiaries, including race and ethnicity of beneficiaries; and
- Compliance with special program requirements (e.g., environmental review records).

#### Documenting Relationship to the Disaster

- Damage or building estimates for physical losses;
- Post-disaster analyses or assessments for economic or non-physical losses;
- Insurance claims; and
- FEMA data.

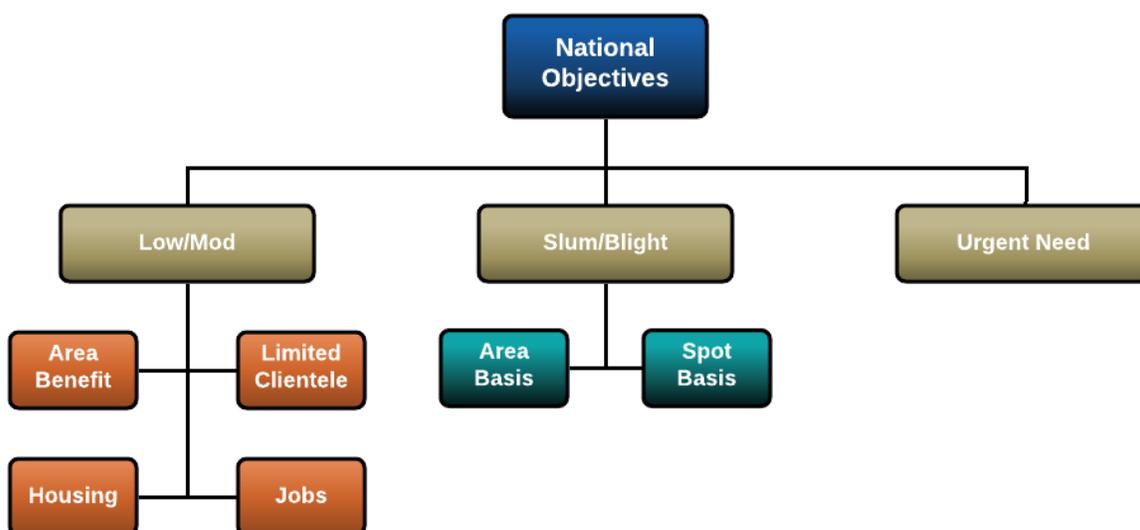
#### Documenting Duplication of Benefits

- Verification of sources of assistance;
  - FEMA award letter;
  - Insurance letter;
  - SBA assistance/declined loans;
- Calculation of CDBG-DR and CDBG-MIT award; and
- Subrogation agreement (or similar agreement).

In addition to GLO resources, HUD has developed a number of record-keeping and reporting resources, including the [2016 CDBG-DR: Subrecipient Management and Recordkeeping Webinar](#) and the CDBG-DR Toolkit. See [Resources](#)—Resource 3.1 at the end of the chapter for additional information.

#### Documenting National Objective

All CDBG-DR funded projects must meet at least one of three HUD National Objectives: low- and moderate-income benefit, slum, and blight (rarely used for CDBG-DR), and urgent need.



### Low to Moderate Income (LMI)

- Determining and documenting income;
- Calculate total cost of the activity, including both CDBG and non-CDBG funds;
- Calculate size, annual income, and FHEO characteristics of households occupying CDBG-assisted and designated LMI units;
- For Multifamily projects only:
  - a copy of the written agreement indicating the total number of dwelling units and the number of LMI units;
- For rental housing only:
  - Rent charged (or to be charged for each assisted unit and
  - Documentation showing the affordability of units occupied (or to be occupied) by LMI Pro-rata option.
- For infrastructure:
  - Documentation of direct or area benefit of LMI population served by the project.

### Slums and Blight

- Boundaries of the project area;
- Description of conditions demonstrating how the area met qualifying criteria (e.g., the area meets a definition of a slum, blighted, or deteriorated/ing area under state or local law); and
- Project description includes steps to eliminate or address one or more of the conditions contributing to the deterioration of the area.



### *Urgent Need*

Urgent need (UN) is used to address emergency situations, including disaster recovery. For CDBG-DR urgent need, a subrecipient need not issue formal certification statements to qualify an activity as meeting the UN national objective. Instead, the subrecipient must:

- Document how each program and/or activity funded under the UN national objective responds to a disaster-related impact and
- Reference (if applicable) in its action plan needs assessment the type, scale, and location of the disaster-related impacts that each program and/or activity is addressing over the course of the applicable deadline for the expenditure of obligated grant funds. The GLO provides guidance to assist subrecipients document urgent need, including the Urgent Need National Objective Form, included in [Resources](#)—Resource 2.2 at the end of the chapter.

It is recommended that subrecipients use the low- and moderate-income benefit national objective for all activities that qualify under the criteria for that national objective. At least 70 percent of the entire CDBG-DR grant must be used for activities that benefit low- and moderate-income persons.

Contact your assigned GLO-CDR Grant Manager for further information about documenting National Objective.

### **3.5 Records Retention**

Project records should provide a detailed, chronological, and historical account of the CDBG-DR and CDBG-MIT project for examination and review by local staff, the GLO, HUD, state and federal auditors, other state agencies, and any other interested persons. The subrecipient must maintain one complete set of files at the city or county offices. The record retention period for CDBG-DR and CDBG-MIT Subrecipient Agreements is three (3) years after the GLO closes the contract with HUD. The record retention period for Subrecipient Agreements does **NOT** begin when the Subrecipient Agreement between the subrecipient and the state is closed.

GLO-CDR will notify subrecipients when a grant has closed by sending a letter that includes the specific date of the grant closeout and the retention period.

If a subrecipient is notified by the GLO in writing, or if other applicable laws and regulations as described in 24 CFR 570.490 apply to a project, the record retention period may be extended. If any litigation, public information request, claim, or audit is started before the expiration of the record retention period, the records must be kept until the action has been resolved.

All CDBG-DR and CDBG-MIT Subrecipient Agreement records must be available for review by HUD until the retention period is satisfied.



### 3.6 Sample File Review Checklist

RECORDS MANAGEMENT				
Subrecipient:				
SUBRECIPIENT AGREEMENT/CONTRACT NUMBER:				
Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
APPLICATION	Recipient's Complete Application (Approved Application Maintained in Austin) to include: Survey Tabulation/Census/ Other Beneficiary Data (If Census data was used, a note stating so is in the file); Public Hearing Information (if conducted; requirement was waived)			
	Records demonstrating each activity meets one of the National Objectives	Application		
	Surveys to support Tabulation and Other Beneficiary Data	Subrecipient		
	Organizational chart: Identify staff that is directly involved with the DR grant.	Subrecipient		
	Responses to GLO Request for Information (RFI)			
Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
SUBRECIPIENT AGREEMENT	Executed Subrecipient Agreement (State Contract)			
	Executed Subrecipient Agreement with Performance Statement and Budget for each activity	Agreement		
	Subrecipient Agreement Amendments and/or Revisions, flagged and filed in numerical order NOTE: this includes all forms and documentation related to requests or approvals for Subrecipient Agreement amendments, revisions, or modifications.			



Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
FINANCIAL	Designated Depository/Authorized Signatory Form and Resolution			
	Direct Deposit Authorization form NOTE: if direct deposit is not used, include a note in the file stating this.			
	Application for TIN (if needed)	Subrecipient		
	Copy of transaction register/general ledger for DR funds			
	Financial Policy and procedure manual used to submit payments to the GLO	Subrecipient		
	Fidelity bonding coverage, current NOTE: proof of coverage must indicate the expiration date and the insureds must include the designated signatories.	Subrecipient		
	Request for Payment packages (draws) in numeric order	Subrecipient		
	Source Documentation to support the receipt and disbursement of DR Funds (e.g., cancelled checks, deposit slips, monthly bank statements, bank account reconciliation records, etc.)			
	Documentation of commitment of local funds, if applicable (e.g., general ledger entry or cancelled check showing what the community paid)			
	Code of Ethics Policy on Fraud, Waste and Abuse			
Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
ENVIRONMENTAL (If all required data is included in the Environmental Review Record, separate folders are not necessary. Any needed Re-Evaluations, however, must be included)	Environmental Review Record/Assessment (ERR)			
	Environmental Checklist			
	The following documents should be included in the ERR and flagged for easy identification:			
	Floodplain Notices/8-step documentation, if applicable			
	Project Boundary Map			
	Public Notices/Publisher's Affidavit			
	Coordinating Letters to/from other agencies			



	Public Comments			
	Request for Release of Funds and Certification form			
	Authority to Use Grant Funds form (AUGF)			
	Documentation of compliance with other applicable laws/authorities			
	Flood plain maps/E.O. 11988 compliance, if applicable			
	Texas Historical Commission notification and response letters			
	Re-evaluation Letters, as applicable			
	Special Permitting—example USACE			
	Certification of Exemption for HUD funded Projects (Administration, Engineering and Planning)			
<b>Category</b>	<b>Files to Maintain</b>	<b>Location of Files</b>	<b>Present Y/N?</b>	<b>File Review Comments</b>
LEAD-BASED PAINT, if applicable; required for Housing	Documentation tenants were provided Lead Hazards or EPA equivalent information			
	Lead-based paint Disclosure form was included in lease agreement and signed by tenant prior to executed lease agreement			
	Documentation lead-based paint evaluation/assessment performed on housing/buildings built pre-1978			
	Documentation of remediation work			
	See Environmental Review Files for details on LBP			
<b>Category</b>	<b>Files to Maintain</b>	<b>Location of Files</b>	<b>Present Y/N?</b>	<b>File Review Comments</b>
PROCUREMENT	Local Procurement Policy			
	Environmental Exemption Form for Professional Services	Application		
	This section should be duplicated for each contract (construction and/or professional services) procured:			
	Rationale for the method of procurement Rationales include (see Project Implementation Manual for descriptions):	Subrecipient		
	Evidence of Affirmative Steps Taken to Assure Participation by Small/Minority Businesses			



Minutes/Resolution Awarding Contract(s)/Amendment(s)			
Executed Contract	Subrecipient		
Executed Contract, Amendments, Work Orders and/or Change Orders in numerical order, if any	Subrecipient		
Insurance Coverage			
Bonding Information, if applicable			
COMPETITIVE PROPOSALS (Request for Proposal/Qualification, Professional Services Only)	Subrecipient		
1. RFP's and/or RFQ sent to professional service providers, if applicable	Subrecipient		
2. Advertisement	Subrecipient		
3. All responses (offers) to advertisement, RFP/RFQ received	Subrecipient		
4. Written review and evaluation of offers received	Subrecipient		
5. Written negotiations with firm and final officer, if applicable			
SMALL PURCHASE PROCUREMENT			
1. Price or rate quotes received			
2. Written documentation of at least three (3) sources contacted and basis for selection			
COMPETITIVE SEALED BID			
1. Bid Package (material, supplies and construction services, only)			
2. Bid Advertisements			
3. Minutes from public bid opening and copies of bids received			
4. Bid Tabulation (List of responding bidders)			
5. Evidence of Bidders' Receipt of Addenda, if applicable			
6. Written reason for rejecting any or all bids, if applicable			



Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
PROCUREMENT (CONTINUED)	NON-COMPETITIVE SEALED BID PROCUREMENT			
	1. Written approval from the GLO			
	2. Evidence of Plans and Bid Documents sent to construction providers			
	3. Bid Tabulation and copies of responses or offers received			
Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
REPORTS	Monthly Reports flagged by year and filed in chronologic order			
	Financial Interest Reports (FIRs) NOTE: FIRs must be filed for the GA, engineer, contractor, and any subcontractors.			
	Other Reports (Section 3 reports)			
Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
ACQUISITION	Initial Real Property Acquisition Report (not detailed)			
	Real Property Acquisition Report (details for each parcel), if any	Subrecipient		
	URA Policy (Acquisition Policy)	Subrecipient		
	For each parcel, easement or right of way to be acquired and/or obtained:	Subrecipient		
	1. Notice to Owner, for Involuntary Acquisitions: include evidence the owner received "When a public Agency Acquires Your Property" and "The Texas Landowner's Bill of Rights"	Subrecipient		
	2. Determine Fair Market Value/ Valuation by appraisal or tax office	Subrecipient		
	3. Invitation to Accompany Appraiser, if applicable	Subrecipient		
	4. Statement of the basis for the determination of Just Compensation, if applicable	Subrecipient		
5. Written purchase offer and documentation of delivery	Subrecipient			



	6. If property is donated, documentation from property owner agreement "Waivers of Right to Just Compensation"	Subrecipient		
	7. Any and all negotiations with property owners	Subrecipient		
	8. Settlement and Contract Sale or Act of Donation	Subrecipient		
	9. Record of purchase (cancelled check)	Subrecipient		
	10. Evidence of Filing with County Clerk			
	11. Record of any appeals or complaints files, if applicable	Subrecipient		
	Back-up Acquisition Documents			
<b>Category</b>	<b>Files to Maintain</b>	<b>Location of Files</b>	<b>Present Y/N?</b>	<b>File Review Comments</b>
<b>DEMOLITION</b>	For Each Property/Parcel Demolished			
	1. A separate file for each property/parcel demolished			
	2. Proof property was vacant prior to demolition			
	3. If property is acquired for construction, see list of required documents in Acquisition			
<b>Category</b>	<b>Files to Maintain</b>	<b>Location of Files</b>	<b>Present Y/N?</b>	<b>File Review Comments</b>
<b>RELOCATION</b>	URA Policy			
	Claim Forms			
	a. Claim(s) for Fixed Payment in lieu of Payment for Actual Moving and Related Expenses			
	b. Claim(s) for Moving Costs			
	c. Claim for Replacement Housing Payment for Homeowners			
	d. Claim for Rental Assistance or Down Payment Assistance			
	Acknowledgement of Receipt of Relocation Expenses/Payments			
	<b>FOR EACH CLAIM</b>			
	Evidence and dates of personal contacts and description of services provided			
	Identification of person, displacement property, beneficiary data, monthly expenses and relocation needs			



	Notice of Eligibility for Relocations Assistance			
	Notice of Displacement			
	Household Case Record for housing needs			
	Referrals to replacement properties and documentation for declining, if applicable			
	Copy of 90-Day Notice to vacate notice, if issued			
	Details of actual replacement property (sale, monthly expenses, date of relocation)			
<b>Category</b>	<b>Files to Maintain</b>	<b>Location of Files</b>	<b>Present Y/N?</b>	<b>File Review Comments</b>
<b>RELOCATION (CONTINUED)</b>	Replacement property inspection report			
	Approval claim form and evidence the person received payment			
	Copy of any complaints and/or appeals			
	Copy of deferred loan lien agreement			
	<b>BUSINESS RELOCATION</b>			
	General Information Notice (GIN)			
	Notice of Interest to Owner			
	Evidence business received timely notice of possible displacements and description of relocation payments and eligible services to include procedures for these services			
	Documentation of referrals to replacement properties			
	Copy of 90-Day Notice to vacate notice, if issued			
	Identification of displacement property, beneficiary data, monthly expenses and relocation needs			
	Copy of replacement dwelling inspection report			
	Copy of each approved claim form and person received payment			
	Copy of any complaints and/or appeals			
	Copy of deferred loan lien agreement, if applicable			



Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
FOR PERSONS/ BUSINESSES NOT DISPLACED	Documentation timely written notice was issued & received that displacement would not take place			
	Documentation occupants received a timely offer of: (a) reasonable opportunity for another dwelling b) reimbursement for out-of-pocket expenses incurred with temporary relocation			
	Ineligible: Documentation occupants elects to move, reason for the move and understands they do not qualify for relocation assistance			
Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
CONSTRUCTION PROJECT FILES	Special studies, surveys, test results for project			
	Copy of preliminary design (s) and cost estimates which were included as part of the application			
	Final design and cost estimates by engineer and acceptance by subrecipient			
Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
LABOR STANDARDS	Appointment of Labor Standards Officer Form			
	The following should be duplicated for each bid package:			
	Wage Rate Determination/Wage Decision			
	10-day Call Confirmation			
	Contract Eligibility Verification (printout <a href="http://SAM.gov">SAM.gov</a> )	Subrecipient		
	Notice to Proceed	Subrecipient		
Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
LABOR STANDARDS (CONTINUED)	The following should be duplicated for each bid package:			
	Pre-Construction Conference Report NOTE: Include sign-in sheet, and minutes.	Subrecipient		



	Additional Wage Rate Classification Requests/Approval, as applicable NOTE: if no additional requests, include a note in the file stating this.	Subrecipient		
	Evidence of LSO Review of Contractor's Weekly Payroll Records (initialed/dated by LSO).	Subrecipient		
	1. Contractors and subcontractors certified weekly payrolls	Subrecipient		
	2. Certified corrected payrolls, if applicable	Subrecipient		
	3. Restitution documentation, if applicable	Subrecipient		
	4. Apprenticeship/Trainee documentation, if applicable	Subrecipient		
<b>Category</b>	<b>Files to Maintain</b>	<b>Location of Files</b>	<b>Present Y/N?</b>	<b>File Review Comments</b>
<b>LABOR STANDARDS (CONTINUED)</b>	The following should be duplicated for each bid package:			
	Employee Interviews			
	Monitoring and Inspection Reports NOTE: these reports may be provided by the engineer. Can consist of reports, pictures, etc.			
	Evidence Federal Wage Determination, EEO and Safety poster were posted at job site			
	Complaints for workers, if any, and action taken			
	Contractor and subcontractor Section 3 Compliance for contracts over \$100,000			
	Certificate of Construction Completion (COCC)			
	As Built Drawings			
	Clear Lien certificate, if applicable			
	Final Wage Compliance Report (FWCR)			
	Documentation for all applicable special conditions (e.g., CCN approval; TCEQ water review, TxDOT review for bridge construction/rehabilitation; TCEQ sewer permit), ADA Accessibility			



Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
FORCE ACCOUNT	Force Account Labor Payroll Records, as applicable NOTE: if force account labor is not utilized, include a note in the file stating this.	Subrecipient		
	Personnel Cost Calculation Sheet			
	Equipment Cost Calculation Sheet			
	Administrative Personnel Time Sheet			
	Force Account Equipment Use and Construction Personnel Time Sheets/Rate Records	Subrecipient		
	Invoices/Justification of Equipment, Fuel and Repairs (non-FEMA)	Subrecipient		
	Force Account Certificate of Construction Completion	Subrecipient		
	Procurement Policy/Rationale for Method of Procurement	Subrecipient		
	Evidence of Analysis of Lease or Purchase Alternatives, as applicable	Subrecipient		
	Method of Procurement utilized for equipment (lease, rental, purchase)	Subrecipient		
	Method of Procurement utilized for materials	Subrecipient		
Category	Files to Maintain	Location of Files	Present Y/N?	File Review Comments
FAIR HOUSING SECTION 3 CIVIL RIGHTS	Complaints (if any) and action taken to notify GLO-CDR or HUD	Subrecipient		
	Complaints and action taken to notify GLO-CDR or HUD, if applicable NOTE: if no complaints have been received, include a note in the file stating this.	Subrecipient		
	Appointment of Section 3 Coordinator Form	Subrecipient		
	The following documents must be referenced in the TOC and flagged in the executed construction contract document:	Subrecipient		
	1. Equal Opportunity Provisions	Subrecipient		
	2. Contractor Certification of Equal Opportunity Compliance	Subrecipient		



	3. Contractor Certification of non-segregated facilities	Subrecipient		
	4. Contractor Certification of Section 3 Compliance			
	Locality's Section 3 Plan or its equivalent	Subrecipient		
	Pre-construction Report NOTE: if this report is included in the Pre-Construction Conference Report, reference that in the TOC and tab it in the Pre-Construction Conference Report	Subrecipient		
	Personnel Policies/Handbook NOTE: include a copy in the file or a note indicating where it is can be accessed	Subrecipient		
	Affirmative Action Plan	Subrecipient		
	Equal Employment Opportunity Plan	Subrecipient		
	Documentation of fair housing activities	Subrecipient		
	Sample Advertisements for Subrecipient Employment	Subrecipient		
<b>Category</b>	<b>Files to Maintain</b>	<b>Location of Files</b>	<b>Present Y/N?</b>	<b>File Review Comments</b>
<b>FAIR HOUSING SECTION 3 CIVIL RIGHTS (CONTINUED)</b>	Section 503 Compliance (affirmative action to employ and advance in employment qualified individuals with disabilities)	Subrecipient		
	Section 504 Self-Evaluation Review Form	Subrecipient		
	Section 504 Newspaper Publication. NOTE: this item is required to be submitted with the Grant Completion Report (GCR)	Subrecipient		
	Section 504 Grievance Procedures. NOTE: this item is required to be submitted with the Grant Completion Report (GCR)	Subrecipient		
	Designation Form for Section 504 and Civil Rights Officer			
<b>Category</b>	<b>Files to Maintain</b>	<b>Location of Files</b>	<b>Present Y/N?</b>	<b>File Review Comments</b>
<b>MONITORING/ INSPECTION FILES</b>	GLO letter(s) of findings			
	Subrecipient response(s) to findings			
	GLO response clearing findings			



	All other correspondence related to GLO monitoring visits			
<b>Category</b>	<b>Files to Maintain</b>	<b>Location of Files</b>	<b>Present Y/N?</b>	<b>File Review Comments</b>
CLOSEOUT (as applicable)	Program Completion Report			
	Final Performance Statement and Budget			
	Map of actual construction locations			
	GLO-CDR administratively complete letter			
<b>Category</b>	<b>Files to Maintain</b>	<b>Location of Files</b>	<b>Present Y/N?</b>	<b>File Review Comments</b>
AUDIT	Method utilized to procure audit firms(s)	Subrecipient		
	Professional Services Contract Agreement for independent auditor			
	Required initial audit report demonstrating financial capacity or independent auditors report			
	Audit Certification Forms in chronologic order for every fiscal year the contract is active			
	Single Audits (OMB A-133) or Program Specific Audits in chronologic order NOTE: \$750,000 expenditure threshold			
	Responses to audit report/audit compliance letters			
<b>Category</b>	<b>Files to Maintain</b>	<b>Location of Files</b>	<b>Present Y/N?</b>	<b>File Review Comments</b>
CORRESPONDENCE/ NOTES	General Compliance Correspondence— Incoming and outgoing correspondence that does not fall into the above categories or specific project file			



### **3.7 Resources**

GLO-CDR has created a comprehensive website which contains necessary forms, checklists, detailed guidance documents, and additional resources to supplement this Implementation Manual. Please see [www.recovery.texas.gov](http://www.recovery.texas.gov) for more information. The following resources are referenced within this chapter and will be updated as new forms and documents are developed.

<b>Resource Number</b>	<b>Topic</b>
Resource 3.1	<a href="#">CDBG-DR Toolkit (HUD)</a>
Resource 3.2	<a href="#">Urgent Need National Objective Form</a>

*Note: Individuals have reported a better experience when using **Internet Explorer or Safari** to view files.*

Please direct all questions regarding your specific program or project to your assigned GLO Grant Manager. Send comments related to the GLO-CDR Implementation Manual to [ImplementationManual.glo@recovery.texas.gov](mailto:ImplementationManual.glo@recovery.texas.gov).