

RECORD-KEEPING CHECKLIST FOR UPPER STORY CONVERSION PROGRAM

CDBG Upper Story Conversion 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

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)

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

Verification that when mitigation was necessary that it was completed or attenuated.

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.

Project File

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.

Project File:

Development Agreement

Rent Calculation Worksheet

Source and Use of Funds form

Financial commitments including construction and permanent financing for all sources of funds other than CDBG

Documentation of Site Control

Green Development Plan and Checklist

Documentation of Non-profit status

Documentation of Proper Zoning

II. Professional Procurement (Applicable for those not a party to the Development Agreement)

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 (If applicable)

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
- 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

Tenant Files

Each tenant should have their own file. Tenant files should include, where applicable, the following items.

Tenant 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
- Eligibility determination documentation
- Demographic data (i.e., family size, minority, disability, female head-of-household, age, etc.)
- Lead hazards identification and all notices (as applicable)
- Executed lease agreement