

UNITED STATES VIRGIN ISLANDS HOUSING FINANCE AUTHORITY

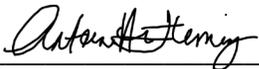
CDBG-DR RECORD KEEPING, MANAGEMENT AND REPORTING REQUIREMENTS

VERSION: 2.0
January 26, 2021

Prepared by:
Virgin Islands Housing Finance Authority



The policies and procedures stated in this manual are current as of January 26, 2021. This Manual represents the current version of the Virgin Islands Housing Finance Authority's (VIHFA) policies which shall provide general guidance for the operation of the CDBG-DR Division. All manuals will be reviewed periodically and will be updated. Therefore, you are strongly urged to visit our website cdbgdr.vihfa.gov or to ensure that you have the latest version. There may be times, however, when a policy or procedure will change before the manual is revised.

SUBJECT: CDBG-DR Record Keeping, Management and Reporting Requirements	
Version Number	2.0
Revised Date	January 26 , 2021
Effective Date	February 2, 2021
APPROVALS:	
 Antoinette Fleming, VIHFA CDBG-DR Director	<u>2/2/2021</u> Date

1.0 VERSION HISTORY

Recordkeeping, Management and Reporting Requirements Version Control

VERSION NUMBER	DATE REVISED	DESCRIPTION
VERSION 1	12/14/2018	CDBG-DR Recordkeeping and Reporting Requirements
VERSION 2.0	01/26/2021	<p>Table of Contents Moved VIHFA Document Checklist to the appendix Moved Document management standards to the appendix.</p> <p>Section 2.3 Moved Section 2 Definitions, to Section 3.0</p> <p>Section 3 Renamed Section 3.0, Overview, as Section 4.0 Moved Purpose section (formerly section 5), under Overview</p> <p>Section 4.0 Renamed Section 4.0 as 3.0 Updated the current list of federal register notices.</p> <p>Section 6.1 Added responsible entities that will serve as record keeping custodians.</p> <p>Added a comprehensive list of all units and their role in record keeping.</p> <p>Section 7.1 Clarification for maintaining records.</p> <p>Section 10 Added email signature template to document management standard outline.</p> <p>Section 11.0 Updated subrecipient file checklist</p>

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2.0 POLICIES

2.1 Version History

Version history is tracked in the table on the title page, with notes regarding version changes. The dates of each publication are also tracked in this table. The first version of this document is 2.0.

Substantive changes within this document that reflect a policy change will result in the issuance of a new version 3.0, an increase in the primary version number. Future policy changes will result in additional revision and the issuance of a new primary version number.

Non-substantive changes such as minor wording and editing, or clarification of existing policy that do not affect the interpretation or applicability of the policy will be included in minor version updates denoted by a sequential number increase behind the primary version number. Such changes would result in a version number such as 2.1, 2.2, etc.

2.2 Policy Change Control Board

Policy review and changes for a program are considered through a change control process. When policy clarifications, additions, or deletions are needed to more precisely define the rules by which the Program will operate, Program staff will submit a Policy Change Request Form or a Request for Decision Form for internal review by the Policy Change Control Board (PCCB). Within the PCCB, two members will separately perform a review to verify that all relevant information and any supporting documentation are included in the request. Upon PCCB concurrence by these two members that the request raises a policy issue, rather than a process issue, the Policy Change Request Form or Request for Decision is forwarded to the Policy Change Control Board for consideration. The requests are compiled and brought before the entire PCCB for a final policy change determination.

The PCCB is composed of the Special Council for Disaster Recovery, the Senior Policy Manager, Senior Program Manager and at least one Subject Matter Expert, and other program staff members representing Program leadership as needed.

The PCCB meets biweekly, as needed, to consider all pending requests but may meet as frequently as necessary to consider critical policy decisions. The schedule for PCCB meetings is expected to move to a lower frequency as the Program matures.

3.0 DEFINITIONS

Developer – refers to an owner and/or contractor of a development project. Usually considered to be a person who develops land through construction.

Document – refers to every paper, book, pamphlet, photograph, film, microfilm, magnetic tape, map, drawing, plan, record, video disk, or any other material read by machine and any other informative material, regardless of its physical form or characteristics, that has been prepared, utilized, received or which has been in the possession or under the custody of an agency. It also includes materials generated electronically even though they may never be printed on paper or other media different from the originally created one.

FEMA – refers to the Federal Emergency Management Agency.

File – a place where documents are kept. A file may be either a physical or an electronic repository of documents. The act of placing and conserving, in one place and adequately classified and identified, any correspondence, documents or other papers related to a person, geographic area, project, or the like, in a way that they are protected from wear, destruction, or loss, and, at the same time, facilitates its location and management at any time.

FOIA – the Freedom of Information Act (FOIA) provides the public the right to request access to records from any federal agency. Federal agencies are required to disclose any information requested under the FOIA, unless it falls under one of nine exemptions, which protect interests such as personal privacy, national security, and law enforcement.

PII – refers to personally identifiable information (PII). It is any data that could potentially identify a specific individual. Any information that can be used to distinguish one person from another and can be used to remove anonymity.

Subrecipient – An entity that is provided CDBG-DR funds by VIHFA for their use in carrying out agreed-upon, eligible activities including autonomous and semi-autonomous, and other governmental agencies and non-profit organizations.

4.0 OVERVIEW

The purpose of the Policy is to standardize the rules for record management and the record keeping of information about VIHFA CDBG-DR-funded programs, to ensure they are applied consistently and transparently maximizing accountability and compliance. In addition, this Policy establishes the rules and procedures for the evaluation and process of giving persons access to public information, in accordance with federal and local laws and regulations.

It is crucial for the successful completion of CDBG-DR activities that VIHFA fully document compliance with all applicable territory and federal regulations. This is accomplished through maintaining comprehensive records, submitting all necessary reports, and ensuring all Subrecipients and Developers are adhering to the requirements laid out in this policy.

This document will outline the Recordkeeping, Management and Reporting standards in accordance with the requirements for the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant – Disaster Recovery (CDBG-DR) Program.

VIHFA must comply with the recordkeeping requirements of the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards including 2 CFR 200.333-.337.

The filing system should be easy to use, access and provide a historic account of activities for examination and review by VIHFA, HUD, and Auditors. All records must be available to the following entities upon request:

- U.S. Department of Housing and Urban Development
- The Office of Inspector General
- The General Accounting Office

These entities must have access to any pertinent books, records, accounts, documents, papers, and

other property that is relevant to the grant. Certain records must be available to the public as well. However, Subrecipients and Developers must keep files that contain personal information, such as social security numbers, in a secure place. It is important to make note of VIHFA and local Freedom of Information laws.

6.0 GOVERNING REGULATIONS

VIHFA is responsible for assuring compliance with federal regulations under 24 CFR 570.490, 2 CFR 200.333-.337 and other related requirements including any future applicable federal regulations. For the latest federal register notices, please visit cgbgdr.vihfa.gov.

6.0 CUSTODIANS

Adequate recordkeeping is the responsibility of all VIHFA Disaster Recovery staff, developers, subrecipients, and contractors that manage CDBG-DR funds. The clear and well-defined expectations of duties allow for tracking of responsibilities and accountability.

6.1 VIHFA

VIHFA CDBG-DR is responsible for recordkeeping at the grant, program, project, and applicant/beneficiary levels. VIHFA CDBG-DR Policy Unit is responsible for periodically reviewing and, when necessary, updating the Recordkeeping, Management and Reporting Policy. The Compliance and Monitoring Unit, in partnership with the Program Management staff shall ensure implementation of this Policy across all programs, projects, and activities.

CDBG-DR has Document Administrators in charge of document administration in compliance with the Act. Particularly, the CDBG-DR Program PMO and legal team will supervise, lead, or perform record information management work. Each CDBG-DR Division Director is responsible of designating a person within their staff to act as a Document Manager Specialist, ensuring this Policy is implemented in their area. Each Division Director responds to the Disaster Recovery Directors. The following USVI CDBG-DR Divisions are responsible for the following:

- **Internal Audit Office (IAO):** The IAO shall ensure appropriate recordkeeping of their work, including audit plans, process documentation and audit reports, comments, and recommendations.
- **Finance:** Financial record keeping is one of the focus areas for HUD review and monitoring. This Unit holds records relating to financial management and expenditures, as well as DRGR, including annual reports and Quarterly Performance Reports. They are responsible for incoming invoices and payments.
- **Legal:** The Special Counsel Unit is responsible for documenting all executed agreements and keeping documents that support and evidence these.
- **Human Resources:** Human Resources shall keep up-to-date files on VIHFA CDBG-DR personnel that include, but is not limited to, application, resume, job description, Confidentiality/NDA, performance and training records, and termination or resignation documentation for each employee.
- **Compliance and Monitoring:** Compliance and Monitoring is one of the key areas when verifying the implementation and compliance of this Policy. It is the area tasked with the

responsibility of all federal, local and subrecipient monitoring documents. They keep administrative, engagement specific and HUD monitoring documents.

- **Procurement:** Every procurement process of VIHFA will have a complete Procurement file that contains all the information required by VIHFA's Procurement Policy and Procedures for CDBG-DR following the requirements of 2 C.F.R. § 200.318(i). The Procurement Division shall ensure that their policy and procedures include the collection of documentation as evidence that the use of funds respond to a need, the procurement method selection, price, and cost analysis, lists of prequalified contractors/vendors, bids, proposals, quotations, and DRGR reporting. Documentation may vary depending on the process followed in the procurement process.
- **Program Management:** Senior Program Managers and Program Management Office are responsible for all CDBG-DR programmatic area records, as implemented directly by VIHFA. They are also responsible for the oversight of proper documentation protocols.
- **Project Managers (PMs) or Points of Contact (POCs):** – PMs and POCs are responsible for files and/or records that document VIHFA's run or managed programs and activities undertaken with respect to specific individual beneficiaries, property owners, and/or properties.

6.2 Subrecipients, Developers and Contractors

6.2.1 Subrecipients and Developers

It is very important for VIHFA CDBG-DR Subrecipients and Developers to maintain and implement recordkeeping and management policies and practices compliant with federal, state, and program requirements. Subrecipients shall keep policies and procedures, as well as other documents that provide guidance and include how they document and define processes for collecting, organizing, storing, and retrieving information on CDBG-DR funded programs. Goals, performance, and proper administration cannot be provided without adequate recordkeeping.

Subrecipients are responsible on maintaining all VIHFA CDBG-DR files on site at the Subrecipient's customary place of business and these must be available for review upon request by VIHFA, HUD, a monitoring entity, or any Petitioner, if applicable. The Subrecipient must designate a person to be responsible for records management. If the Subrecipient relies on an electronic record-keeping system, contingency plans for data recovery and access must be part of their policies and procedures.

Every Subrecipient should establish and maintain at least three (3) major categories of records:

- **Administrative records:** Files and records that involve the overall administration of the Subrecipient's or Developer's CDBG-DR activities. They include personnel files, property management files, general program files, and legal files.
- **Financial records:** Files and records related to the finances of the Program. Example of these are charts of accounts, accounting procedures, accounting journals and ledgers, purchase orders, invoices, procurement files, bank account records, audit files, and financial reports.

- Project/case files: Files that document the activities undertaken with respect to specific individual beneficiaries, property owners, and/or properties.

During the agreement and application period, Subrecipients and Developers are responsible for record retention, as it relates to the specific CDBG-DR programs or projects under agreement. Entities are responsible for adhering to the VIHFA-approved recordkeeping policy. In the event that a Subrecipient or Developer does not have existing recordkeeping policies, they are required to develop them. This Policy can be used as an example or may be adopted and implemented.

The Subrecipient shall maintain records as required by 24 CFR § 570.506 and discussed further in this Policy. Although the specific documentation maintained may vary, depending on the type of project or activity (infrastructure, housing, economic revitalization, etc.), Subrecipients/Developers are required to maintain comprehensive, up-to-date project files. The files should cover all aspects of the project, beginning with application and eligibility, cost allowability and ending with program closure. In addition, VIHFA provides standard file management and recordkeeping guidance as needed or requested for Subrecipients and Developers. Each project or case file should include documentation of the National Objective being met, the characteristics and location of beneficiaries, the eligibility of the activity, the compliance with special program requirements, the allowability of the costs, and the status of the case/project.

6.2.2 Contractors

General reporting and recordkeeping requirements are outlined in contracts between VIHFA and its contractors. During the contract period, contractors are responsible for record retention for products and/or services delivered. These records may include, but are not limited to monthly reports, invoices and photo evidence, work projections, and other documentation relevant to the contract and the funds expended, such as, financial and cost accounting records, pay administration records, and acquisition and supply records.

Contractors shall keep detailed and separate files for CDBG-DR funded projects. They shall have policies and procedures in place for record maintenance, protection, retention, and destruction. In the event a Contractor does not have existing recordkeeping policies, this Policy shall be adopted and implemented. Contractors shall make available, records which includes books, documents, accounting procedures and practices, and other data or supporting evidence to VIHFA, upon request. They shall retain supporting evidence to satisfy contract negotiation, administration, and audit requirements for duration set forth in this Policy.

7.0 RECORDS MANAGEMENT

Well managed records help entities assess the impact of programs, reduce redundant efforts, and share knowledge within and across the organization. Records support the principles of transparency. VIHFA, as a grantee, will comply with applicable federal and local laws and regulations related to record management, thus ensuring the agency's capabilities to fulfill their statutory mission.

7.1 Record Maintenance

Recordkeeping is a crucial piece of the overall information management strategy. Accurate recordkeeping is vital to ensure that the documentation for CDBG-DR programs is compliant with federal, state, local, and program requirements. Files must be complete and should be able to portray the program's life, from its inception to its completion. In other words, records should be kept in a manner that clearly tells the whole story of a Community Development Block Grant -

Disaster Recovery (CDBG-DR) project from beginning to end. Complete and proper recordkeeping ensure success in monitoring and audits. Entities must establish a system for recordkeeping that assists VIHFA with the review of files for compliance.

The common standard for recordkeeping is that records must be accurate, complete, and orderly. VIHFA CDBG-DR maintains all records not managed by CDBG-DR subrecipients. Subrecipients maintain project related documentation, including financial records, supporting documents, and statistical records associated with grant funds as established in this Policy.

The appendices identified major file categories, and the materials that should be maintained in each file. **This list is not all-inclusive**; therefore, refer to applicable laws and regulations as well as the other sections of this manual for more information.

The following procedural guidelines are suggested to be considered when designing the filing system:

- Separate files should be maintained for each awarded project or program.
- Files should be coded for each area of compliance to allow for easier access; Responsibility for file-keeping should be delegated to the CDBG-DR Program staff to provide consistency.
- Files should be secured at all times.
- Files should be maintained in accordance with the Sample File Listing. (See appendices)
- Files are to be saved electronically and must be searchable when saved in that format. Hard copy (paper) files can be kept; however, it is required to back up all files electronically.

7.1.1 Record Maintenance Requirements

The following records are the minimum required to be maintained by VIHFA and its Subrecipients/Developers:

- Records providing a full description of each activity assisted with CDBG-DR funds.
 - Location;
 - Amount of CDBG-DR funds budgeted, obligated, and expended; and
 - The provision in subpart C under which it is eligible.
- Records demonstrating that each activity undertaken meets one of the criteria for National Objectives, as set forth in § 570.208.
- Records demonstrating that the recipient has made determinations required as a condition of eligibility of certain activities. Where applicable, records which demonstrate compliance with the requirements of § 570.202(g) or §570.204(a)(5) or document the State's grant recipient's basis for exception to the requirements of those paragraphs.
- Records, which demonstrate compliance with citizen participation requirements.
 - Records, which demonstrate compliance with the requirements regarding acquisition, displacement, relocation, and replacement housing.
 - Fair housing and Equal Opportunity records.
 - Financial records, as required by 2 C.F.R. part 200, 24 C.F.R. § 570.502, and state requirements, which include, but are not limited to:
 - Current authorizations and obligations of CDBG-DR funds;
 - Unobligated balances (funds remaining available for distribution);
 - Assets and liabilities;

- Program income (if any);
 - Evidence indicating that the use of program funds belongs to the eligible activity; and
 - Evidence indicating that each expenditure is necessary, reasonable, and directly related to the project.
- Agreements and other records related to lump sum disbursement to private financial institutions for financing rehabilitation.
 - Records required to be maintained, in accordance with other applicable laws and regulations set forth in subpart K of this part.

7.1.1.1 File Checklists

It is the responsibility of each VIHFA CDGB-DR Unit and Program Area to develop their own file and document checklists (these may be in electronic format), that shall include the major file categories that the program maintains and the materials and/or documents the program keeps in each file. CDBG-DR Program staff and senior administrative staff will have access to the CDBG-DR Records USVI CDBG-DR repository under Microsoft Teams, where all executed program and administrative documents will be stored. Upon execution, program staff and senior administrative managers will upload documents to their respective files. The electronic file must contain all area and program documentation and must always be up-to-date, complete, and accurate. It is the Unit and Program Area's responsibility to periodically review and maintain these to reflect up-to-date requirements. The Program Management Office will also review files on a periodic basis to ensure that documentation is up-to-date, complete, and accurate.

7.1.1.2 Performance and Evaluation Report

While administering CDBG-DR funds, VIHFA will enter all information regarding its performance in the DRGR system with sufficient detail to permit HUD's review of VIHFA's performance on a quarterly basis through the Quarterly Performance Report (QPR) and to enable remote review of VIHFA's data.

7.1.1.3 Document Control

VIHFA maintains all its documentation utilizing a combination of electronic and paper recordkeeping systems for managing their records, depending on the needs of each Area. VIHFA develops files on grant, program, project, and applicant/beneficiary basis. It uses a naming convention, file management structure, and program checklists, as defined in the VIHFA's CDBG-DR Document Management Standard Operating Procedures.

8.0 RECORD RETENTION

All records for the CDBG-DR Program must be adequately protected and maintained to ensure that records that are no longer needed or are of no value, are discarded at the proper time.

VIHFA, its Subrecipients and Developers, are responsible for maintaining all records pertinent to a CDBG-DR funded project, including supporting documentation, for three (3) years from the date VIHFA closes the CDBG-DR and CDBG-DR MIT program grants with HUD in accordance with 24 CFR 570.490(d). Because this required record retention period is not an exact date or time period, VIHFA will notify Subrecipients and Developers when the program has been closed with HUD and include the end date of the record retention period.

VIHFA and all Subrecipients will follow their normal agency or territory policies for all non CDBG-DR records.

8.1 File Transfer at Contract Closeout

Subrecipients and Contractors are responsible for record retention during the agreement or contract period, respectively. However, their obligations do not end until all closeout requirements are completed. Important aspects of agreement/contract closeout activities include:

- Determine how files are being transferred from the Subrecipient/administering entity/Contractor to VIHFA, at the end of the agreement/contract period.
- Provide guidance outlining closeout requirements, six (6) months prior to the agreement/contract closeout.

Programmatic records, reports, documents, or any other material resulting from CDBG-DR funded programs, projects and/or activities shall be turned over to VIHFA at the conclusion or termination of the contract, or earlier, at VIHFA's discretion.

9.0 REPORTING REQUIREMENTS

9.1 Quarterly Reporting

Monthly Status Reports (MSR's) will be used to assess program progress, timeliness and to justify needs. It is important because it provides the VIHFA with information that is required to be provided to the U.S. Department of Housing and Urban Development (HUD) on a quarterly basis. Therefore, reports must be submitted on time and accurately to Program Managers who are responsible for reviewing and approving subrecipient monthly reports. Upon approval, program managers will forward monthly reports the CDBG-DR Compliance and Monitoring unit.

Monthly reports will be required by the 10th of each month following the month that is being reported on (ex. January's report must be submitted by February 10th).

Submission of the required Monthly Status Report begins with the first report deadline after the Subrecipient receives project approval and continues until the Subrecipient has submitted the Final Monthly Status Report and the closeout forms. Payment requests will not be processed, and no additional funds will be awarded if Monthly Status Reports are delinquent.

Each CDBG-DR unit will also be responsible for updating their section of the internal monthly report for review by the executive director. The monthly reports are also due by the 10th of each month following the month that is being reported on.

APPENDICES

10.0 Document Management Standards

The purpose of the document management standards outline is to ensure consistency across all documents within the CDBG-DR Program. This outline provides details on naming conventions, version control, acronyms, and hierarchy and formatting for all word documents. The division is also seeking to maintain consistent branding for public facing documents that are easily identifiable for the program.

10.1 File Naming Convention

a. Working Documents: **21.3.1_DocumentTitle_V1**

Shortened titles are fine, just be consistent throughout the life of the document. See acronym list. Utilize draft watermark for working documents. Dates should always be listed as: year, month, day. In working documents, always utilize the version control table (see section 2.) Internal working documents can also be managed via Microsoft teams for team collaboration.

b. Revisited Document: **21.3.5_DocumentTitle_V2**

Next iteration of this same document- a new version is triggered when the previous version has already been reviewed by the senior staff and new amendments and changes are needed.

c. Finalized Document (Internal): **21.3.5_DocumentTitle_FINAL**

Final copy or version gets a sign off from Senior Staff member.

d. Final Document (External): **21.3.8_Document Title_FINAL.pdf**

The Final document should always be exported as a PDF. Version control table should also be removed from the header.

10.2 Version Control Table

- e. Include the following table on a cover page of all documents as a header (click *Different First Page Header* [under the Design Tab] so it is not on every page)

Version	Document Approver	Task Lead	Primary Support	Due Date
	(Senior Staff Member)	(Name)	(Name)	(Date)
Copy Edit Done by: (Initials and Date)				
Approved: (Senior Staff Member Initials and Date)				

*To be removed by task lead or senior staff before sharing externally (public)

10.3 Acronyms

Departments

C+M – Compliance and Monitoring
 FM- Financial Management
 ACC- Accounting
 LEG-Legal
 ADM-Administrative
 MIS- Management Information Systems

Document Type

RFP- Request for Proposal
RFQ – Request for Qualification
RFB- Request for Bid
Q+A- Question and Answer
MOU- Memorandum of Understanding
AP- Action Plan
P+P- Policies and Procedures

Descriptions

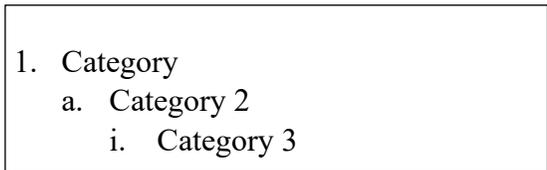
STT- St. Thomas
STJ – St. John
STX- St. Croix
SP- Spanish
ENG- English
EXEC- Executive
SUM- Summary

Agencies

VIDPW- Virgin Islands Department of Public Works
VIWMA – Virgin Islands Waste Management Authority
VIDPP- Virgin Islands Department of Property and Procurement
VIDHS- Virgin Islands Department of Human Services
VIWAPA- Virgin Islands Water and Power Authority
VIHA- Virgin Islands Housing Authority
VIPA- Virgin Islands Port Authority
VIDHS- Virgin Islands Department of Human Services
GVI- Government of the Virgin Islands
VISPR- Virgin Islands Sports, Parks and Recreation
UVI- University of the Virgin Islands
VIDOE- Virgin Islands Department of Education
WICO- West Indian Company Limited
USVIEDA- USVI Economic Development Authority
VITEMA- Virgin Islands Territorial Emergency Management Agency
VIDOL- Virgin Islands Department of Labor
VIDOT- Virgin Islands Department of Tourism
USVIPFA – USVI Public Finance Authority

10.4 Hierarchy and Formatting

- Default Font: Times New Roman (Body)
- Default Size: 12
- Font Color: Black
- Default Spacing: Single-space (0 pt. before and after)
- Default List Structure: Numbering (Microsoft Numbered List), then Letters for subcategories. For third tier categories, use roman numerals.



Footer: (Left) Document Title | (Right) Page Number. (See example below)

Document Name	1
---------------	---

Header

TITLE – BOLD UPPERCASE fs20

SUBTITLE – Regular fs16

HEADING 1: UPPERCASE UNDERLINE fs16

Heading 2: Regular fs14

Heading 4: Regular Underline fs14

Body paragraph text: Regular fs12

10.5 Email Signature

All staff persons of the CDBG-DR division must maintain a standard email signature. Additional quotes or links that are not relevant to the Authority are not permitted to be included within the email signature. Email signatures are required as communication via email is often used as documentation for subrecipient files. Email signatures will confirm who the sender/receiver is.

Full Name
Title, Division

Employer/Agency
Program/Division
Address 1
Address 2

Email
Website
Telephone
Fax

Jane H. Doe

Administrative Assistant, CDBG-DR

Virgin Islands Housing Finance Authority
Community Development Block Grant-Disaster Recovery Program
31ab Taarneberg
St. Thomas, VI 00802

Email: jdoe@vihfa.gov

Website: www.vihfa.gov

Telephone: (340) 777-4432 Ext. 2210

Fax: (340) 775-7913



11.0 VIHFA File Checklists

11.1 VIHFA General File

- CDBG-DR Action Plan and all amendments
- HUD Contract
- All written correspondence (not including emails)
- Personnel records
- Property Management documents

11.2 Citizen Participation File

- Citizen Participation Plan
- Notices of Public Hearing
- Minutes from the public hearing
- Evidence of all other citizen outreach techniques
- Citizen complaints and relevant correspondence (if applicable)
- Photos of Public Events

11.3 Fair Housing and Equal Opportunity

- Documentation of all other efforts to Further Fair Housing (including Fair Housing Ordinance)

11.4 Financial Management

- Financial Management Policies and Procedures
- Financial Management Standard Operating Procedure
- Chart of Accounts
- Copies of executed SF-424 Form
- Program Income Data (sources and amount by transaction)
- Source documentation for all VIHFA transactions
 - Purchase Orders, Invoices, Contracts
 - Timesheets for CDBG-DR staff
 - Authorized Signature Cards
 - Claim Vouchers
 - Copies of grant agreements, subrecipient agreements and contracts between VIHFA, HUD and vendors
- Disbursement Information (checks, EFT vouchers, etc.)
- Capital Assets records (for all real property acquired with CDBG-DR funds)

11.5 Procurement Records

- All Procurements utilizing CDBG-DR funds
 - Documentation of Cost Reasonableness Estimate for all procurements
- Supplies/Materials
 - Copy of Request for Quotation (RFQ) (email, telephone notes, etc.)

- Documentation of Notice to DAS for M/WBE participation
 - Documentation of all quotes received
 - Justification of selection
- Professional Services
- Copy of the Request for Proposal (RFP) or Request for Qualifications (RFQ)
 - Copy of the RFP/RFQ newspaper or other form of advertisement
 - Documentation of notification to DAS for M/WBE participation
 - List of companies who submitted response to Request for Qualifications or Proposals
 - RFP/RFQ evaluation and scoring documents
 - List of short-listed firms and documentation of interview process
 - Short-listed firms' evaluation and scoring documents
 - Justification for selection of contractor
 - Award letter
 - Notification to unsuccessful bidders
- Construction and Related Services
- Copy of Invitation for Bid (IFB)
 - Copy of IFB newspaper or other form of advertisement
 - Certified mail receipts from MBE/WBE firms
 - Minutes from public meeting where IFB's were opened
 - Copy of the bid tabulation sheet, certified by the project architect/engineer
 - Justification of selection
 - Award letter
 - Notification to unsuccessful bidders

11.6 Contract Development

- All Contracts
- Copies of SAM registration and consultant/contractor clearances (SAM.gov)
 - DUNS number for all consultants, contractors, and sub-contractors
- Professional Services
- Copy of Contract with the required federal contract provisions (outlined in the VIHFA Agreement)
- Construction – Related Services
- Copy of Contract with the required federal contract provisions (outlined in the VIHFA Contract)
 - Copy of the Bid Guarantee
 - Copy of the Performance Bond
 - Copy of the Payment Bond
 - Copy of contractor(s) insurance policy
 - Disclosure Report for each contract
 - Documentation on all Change Orders
- Subrecipient Files
- Copy of Subrecipient Agreement with the required federal contract provisions (outlined in the VIHFA Contract)

- o Environmental Review documents
- o Project detailed scope of work and milestones.
- o Detailed Budget (sources and uses) and Expenditure information (including draw requests)
- o Evidence of National Objective and Eligible Activity
- o Duplication of benefits analysis
- o Monitoring letters and correspondence
- o Documentation of tie to storm
- o Evidence of Technical Assistance
- o Monthly Status Reports (MSR's)
- o Monitoring reports and follow-up correspondence including resolution of findings or concerns

11.7 Section 3

- Section 3 Plan
- Documentation of all efforts to train/hire low-income residents of the project area
- Copies of all Section 3 Reports (HUD Form 60006)

11.8 Environmental Review Records (ERR)

- Environmental Review Record Checklist
- Scope of Work for Project/Activity
- Copy of environmental studies (e. g. archaeological surveys, etc.)
- Copy of all maps and drawings
- Copy of Request for Release of Funds
- Notification of publication for RROF and FONSI
- Release of Funds from HUD (Authorization to Use Grant Funds)
- Exempt and CENST Activity Project Classification
- Categorically Excluded Projects Subject To
- Assessed Activity Project Classification

11.9 New Construction Files

- General File
- Property File (per homebuyer assisted)

11.10 Housing and Rental Program Files

- General File
- Property File (per household assisted)

12.0 SUBRECIPIENT FILE CHECKLISTS

12.1 Application File

- Subrecipient Agreement
- Subrecipient Agreement Amendments
- CDBG-DR Approved Project Application
- Executed Project Agreement
- Authorized Signature for Request for Payment form
- All correspondence with VIHFA and Subrecipient
- Project Inspection reports

12.2 National Objectives

Subrecipients must maintain records that funded activities meet one of the national objectives. Depending on the objective, the files must contain the specific documentation below. This documentation can also be used in reporting performance measures information.

- Low/Mod Area Benefit
 - Colored Map showing boundaries of service area
 - Justification of how the project is benefiting the determined service area
 - For service areas that are smaller than Island-wide, maps must include detail including street names
 - HUD approved Census data including total persons, number and percentage low/mod
 - Evidence area is primarily residential
 - Survey documentation (if applicable)
- Low/Mod Limited Clientele
 - Income verification of households (using the Section 8 definition) including source documentation
 - Documentation that the beneficiaries are low/mod or presumed to be low/mod (by category)
 - Documentation of income verification by another program where service is restricted to people with low/mod incomes
- Low/Mod Job Creation and Retention
 - Number of jobs created or retained
 - Type and title of jobs created or retained
 - Income Verification Forms of persons benefiting from the jobs created or retained
- Slum and Blight - Area
 - Map of Area designated with boundaries clearly defined
 - Documentation and description of blighted conditions (e.g., photographs, structural surveys, or development plans)
 - Resolution/Ordinance declaring area blighted under Territory laws
- Slum and Blight - Spot
 - Address of Property

- Documentation and description of blighted conditions (e.g., photographs, structural surveys, or development plans)
- Resolution/Ordinance declaring the property blighted under Territory laws
- Urgent Need
 - Documentation of threat to health and safety
 - Documentation of recent origin
 - Certification that other financing resources were unavailable, and CDBG-DR had to be used (including ability to borrow, etc.)

12.3 Financial

- Copies of all Vendor/Subrecipient Invoices
- Certified timesheets to support personnel expenses
- Request for Payment
- Copies of all Disbursement Checks
- Cash Receipts Journal
- Cash Disbursement Journal
- General Ledger
- Property Management Register

12.4 Procurement

- All Procurements utilizing CDBG-DR funds
 - Documentation of Cost Reasonableness Estimate for all procurements
- Supplies/Materials
 - Copy of Request for Quotation (RFQ) (email, telephone notes, etc.)
 - Documentation of Notice to DAS for M/WBE participation
 - Documentation of all quotes received
 - Justification of selection
- Professional Services
 - Copy of the Request for Proposal (RFP) or Request for Qualifications (RFQ)
 - Copy of the RFP/RFQ newspaper advertisement
 - Documentation of notification to DAS for M/WBE participation
 - List of companies who submitted Responses to Request for Qualifications or Proposals
 - RFP/RFQ evaluation and scoring documents
 - List of short-listed firms and documentation of interview process
 - Short-listed firms' evaluation and scoring documents
 - Justification for selection of contractor
- Construction and Related Services
 - Copy of Invitation for Bid (IFB)
 - Copy of IFB newspaper advertisement
 - Certified mail receipts from MBE/WBE firms
 - 'If Davis Bacon, must have wage determination as part of procurement docs
 - Minutes from public meeting where IFB's were opened
 - Copy of the bid tabulation sheet, certified by the project architect/engineer
 - Justification of selection

12.5 Contract Development

- All Contracts
 - Copies of all consultant/contractor clearances (SAM.gov)
 - SAM registrations for all contractors/consultants (when applicable)
 - DUNS number for all consultants, contractors, and sub-contractors
- Professional Services
 - Copy of Contract with the required federal contract provisions (outlined in the VIHFA Agreement)
 - Disclosure Report for each contract
- Construction – Related Services
 - Copy of Contract with the required federal contract provisions (outlined in the VIHFA Assistance Agreement)
 - Copy of the Bid Guarantee
 - Copy of the Performance Bond
 - Copy of the Payment Bond
 - Wage determination
 - Section 3 contract language
 - FFATA requirements
 - Copy of contractor(s) insurance policy
 - Disclosure Report for each contract
 - Proof of the established Retainage Account (if applicable)
 - Documentation on all Change Orders, along with cost reasonableness evaluation

12.6 Payment File

- Copies of all Contractor/Consultant Invoices
- Copies of Payment Requests in Chronological order
- Approved Cost Summary (and revisions)
- Authorized Signature for Request for Payment form

12.7 Audit File

- Copy of Audit Reports
- Responses to Audit Findings (if applicable)
- Copy of VIHFA Acceptance or Disapproval letter
- Subrecipient response to VIHFA findings (applicable if audit was disapproved by VIHFA)
- Request for Proposal (RFP) for auditing firm

12.8 Acquisition and Relocation Files

Acquisition (See HUD Handbook 1378, Chapter 6 and Appendix 24)

A separate file must be maintained for each property acquired and must include:

- Property owner name and address
- Address of property to be acquired
- Copy of market estimate on property valued under \$10,000.00
- Copy of Appraiser's identification card (when applicable)
- Preliminary Acquisition Notice to Owner Invitation to the owner to accompany appraiser Appraisal Reports.

- Review of Appraisal
- Copy of written purchase offer
- Purchase agreement
- Certification of voluntary acquisition
- Copy of donation/waiver forms (if applicable)
- The deed to the property to be acquired.
- Certification that property did not have tenant and was owner occupied

Relocation (See HUD Handbook 1378, Chapter 6)

A separate file must be maintained for each household relocated and must include:

- A household survey, which should include the names, ages, and demographic information of the household to be relocated
- A description of the nature of the advisory services offered, including the dates they were offered and any brochures or pamphlets explaining their rights
- Evidence of correspondence concerning the rights and payments available to displaced persons
- 90-day advance Relocation Notice (and evidence of delivery and receipt)
- 30-day Displacement (or Non-displacement Notice if returning) Notice (and evidence of delivery) Evidence of at least three referrals to comparable units Inspection report on referral units.
- Documentation on the type of payment made
- Evidence that payment was made (canceled check or the like)

12.9 Labor Standards

- Copy of Wage Determination Assignment Notice
- Copy of Wage Determination Lock-in Notice
- Justification of Wage Determination effective other than bid opening (if applicable)
- Copy of construction plans and specifications with appropriate labor standards documentation attached
- Copy of the Contractor/Subcontractor Verification form
- Copy of the Notice of Contract Award
- Copy of the construction-related contract(s) with the HUD 4010 form and Federal Construction Contract Provisions referenced or attached
- Copy of the Preconstruction Conference Notes
- Copy of contractor(s) fringe benefit programs
- Copy of any apprenticeship certification programs, if applicable
- Copy of Contractor(s) Certification form
- Copy of Subcontractor(s) Certification forms, if applicable
- Copy of all weekly certified payroll reports for contractor(s)/subcontractor(s)
- Copy of all employee interviews
- Copy of all correspondence related to submission of payrolls and/or compliance
- Documentation of any wage deficiencies and copies of restitution payments (if applicable)
- Copy of the Final Inspection/Project Completion report

12.10 Contractor File

- Copies of Payment Requests in chronological order
- Copies of all inspection reports, engineering logs, field notes

12.11 Reporting File

- Monthly Status Reports

12.13 Monitoring File

- Construction Closeout Checklist
- Construction Closeout Certification
- VIHFA monitoring letters
- Evidence of corrective actions in relation to VIHFA findings (if applicable)
- Certificate of Completion