

CDBG Required Documentation Checklists

The following tables provide listings of required documentation for CDBG **Housing Program** activities. A separate list is provided for each of the primary activity types. This checklist details the types of documentation required for:

1. Threshold prior to Standard Agreement Issuance
2. Submitted prior to First Draw
3. Submitted with Financial Reports (aka request for reimbursement)
4. Submitted with Closeout
5. Retained in local files – available for HCD, HUD, or OIG monitoring and audit.

The tables below show backup documentation based on activity type and phase. Not all documents will be required in all circumstances.

Please note: Grantees must not submit sensitive Personal Identifying Information (PII) when documenting incurred costs. This may include a combination of first and last names, social security numbers, birthdates, addresses of employees, etc. Documentation containing sensitive PII must either be de-identified or redacted. Any documentation containing sensitive PII submitted via the eCivis Grants Management System will be immediately returned without further review so that grantee can remove and replace with documentation that does not contain sensitive PII.

| Housing Programs | |
|---|--|
| Documentation to be collected PRIOR to Standard Agreement Issuance | |
| <input type="checkbox"/> | Completed Application |
| <input type="checkbox"/> | Resolution |
| <input type="checkbox"/> | Budget |
| <input type="checkbox"/> | Environmental Review Record |
| <input type="checkbox"/> | Draft Subrecipient Agreement (as applicable) |
| <input type="checkbox"/> | Draft Program Guidelines (as applicable) |

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| Housing Programs |
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| Documentation to be Collected BEFORE FIRST DRAW |
| <input type="checkbox"/> Executed subrecipient agreement if applicable (includes project description/scope of work, timetable, budget, milestones, subrogation agreement) |
| <input type="checkbox"/> Authorization to Use Grant Funds (AUGF) or Signed CENST or Signed CEST |
| <input type="checkbox"/> SAM.gov Excluded parties review of subrecipients, contractors, and first tier subcontractors |
| <input type="checkbox"/> Executed contracts, if applicable (includes project description/scope of work, timetable, budget, milestones, subrogation agreement) must be dated AFTER receipt of AUGF, if applicable. |
| <input type="checkbox"/> Income verification forms/templates, including description of source documentation requested for each assisted household (owner-occupant or tenant) |
| <input type="checkbox"/> Copy of template lien or use restriction per Program Guidelines (owner-occupant and/or tenant) |
| <input type="checkbox"/> Final Program Guidelines (as applicable) |
| <input type="checkbox"/> Copy of affordable rent agreement (rental rehab) |
| Documentation FOR EACH DRAW REQUEST/Financial Report (including first and last). NOTE: For housing programs, please submit all relevant documentation on a per household basis at the time assisted rather than as costs are incurred. |
| <input type="checkbox"/> Financial Report cover sheet: total contract amount, amount requested, retainage (if any), amount remaining |
| <input type="checkbox"/> For housing rehabilitation programs: draw request/contractor invoice (preferably on AIA form) |
| <input type="checkbox"/> Timesheets that include dates and hours worked for Grantee or Subrecipient Staff Costs for general administration or activity delivery. Reports should include name, title, hours worked, time period, description of work, and rate of pay and/or total cost. May include government employee names, but using anonymous employee IDs is a better practice. If this information is not generated in Grantee's payroll system, supplemental documents (e.g. Excel spreadsheet) may be submitted. |
| <input type="checkbox"/> For general administration or activity delivery via contractor: Itemized invoice with documentation for costs incurred for all services, supplies, materials, labor, etc. Invoices should include business name, description of costs, rates/charges, and project location address if applicable. |
| <input type="checkbox"/> Tier 2 CEST as applicable |
| <input type="checkbox"/> For housing rehabilitation programs: signed progress reports as applicable |

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| Housing Programs |
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| <input type="checkbox"/> For Homebuyer Assistance programs: final Settlement Statement, Closing Disclosure, Promissory Note, and Deed of Trust as applicable |
| <input type="checkbox"/> SAM.gov Excluded parties review of subrecipients, contractors, and first tier subcontractors |
| <input type="checkbox"/> Narrative field in the GMS Financial Report should thoroughly explain submitted documentation |
| <input type="checkbox"/> If Grantee has paid subrecipient/contractor prior to receiving reimbursement by HCD, submit proof of payment to subrecipient/contractor (e.g. General Ledger or canceled check showing payee name and date of issuance). If subrecipient/contractor will not be paid until reimbursement received from HCD, Grantee must indicate this in the Financial Report Narrative. |
| Documentation for Award Closeout a.k.a. “Financial Report (Closeout)” in eCivis GMS |
| <input type="checkbox"/> Closeout Package |
| <input type="checkbox"/> Closeout Completion Form (reports all beneficiaries and required demographic information in the aggregate – does not include individual beneficiary names, address, or assistance amounts) |
| <input type="checkbox"/> Proof of posting for Closeout Final Hearing |
| Documentation Retained in Local Files* |
| Application and Standard Agreement File |
| <input type="checkbox"/> Copy of original application |
| <input type="checkbox"/> Copy of any approved amendments |
| <input type="checkbox"/> Executed Standard Agreement |
| <input type="checkbox"/> Program Guidelines |
| <input type="checkbox"/> Correspondence related to grant administration (decisions made, approvals issued, waivers, etc.) |
| National Objective |
| <input type="checkbox"/> Demographic information for each assisted household (race, ethnicity, single head of household, elderly, income, household size) |
| Environmental Review |
| <input type="checkbox"/> Scope of work for the program |

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| <input type="checkbox"/> Environmental Review Certificate of Categorically Excluded Subject to Part 58 (CEST) or Environmental Assessment Format completed and signed by Certifying Officer |
| <input type="checkbox"/> Supporting documentation of consultations including responses |
| <input type="checkbox"/> Copy of floodplain process, including advertisements and publisher’s affidavit (if applicable) |
| <input type="checkbox"/> Copy of Notice of Intent to Request Release of Funds (NOI/RROF) or Combined Notice (FONSI/NOI/RROF) advertisement including publisher’s affidavit or posting documentation |
| <input type="checkbox"/> Copies of any comments received |
| <input type="checkbox"/> Authority to Use Grant Funds (AUGF) from HCD |
| <input type="checkbox"/> Documentation of any mitigation completed in accordance with the Environmental Review Record. |
| Public Participation |
| <input type="checkbox"/> Public Participation Plan and Housing and Community Development Plan |
| <input type="checkbox"/> Evidence of both public hearings (publisher’s affidavit, photographs of posting, evidence of other public outreach, meeting minutes, sign-in sheets, copies of complaints and responses) |
| <input type="checkbox"/> Language Access Plan (if applicable) |
| Fair Housing |
| <input type="checkbox"/> Documentation of completion of at least one Fair Housing Activity |
| <input type="checkbox"/> Demographic statistics on all applicants denied participation (housing rehab, rental assistance) |
| <input type="checkbox"/> Documentation of all efforts to affirmatively further fair housing and equal opportunity, if applicable |
| Financial Management |
| <input type="checkbox"/> General Ledger, Receipts and Disbursement Ledger |
| <input type="checkbox"/> Accountable Property Inventory |
| <input type="checkbox"/> Copies of all contractor/vendor invoices |
| <input type="checkbox"/> Documentation of all force account labor (force account labor must be pre-approved by HCD) |

CDBG Required Documentation Checklists

| Housing Programs |
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| <input type="checkbox"/> Documentation for loan payments |
| <input type="checkbox"/> Copies of all payment requests in chronological order |
| <input type="checkbox"/> Copy of authorized signature(s) for Request for Payment |
| <input type="checkbox"/> Copy of audit reports and all findings and responses |
| <input type="checkbox"/> Cost Allocation Plan (if applicable) |
| <input type="checkbox"/> Approved Indirect Cost Rate (if applicable) |
| Procurement (for each procurement utilizing CDBG funds) |
| <input type="checkbox"/> Procurement policies and procedures |
| <input type="checkbox"/> Written standards of conduct covering conflicts of interest |
| <input type="checkbox"/> Documentation of Independent Cost Estimate for all procurements |
| <input type="checkbox"/> Documentation of Cost or Price Analysis for all procurements over \$250,000 |
| <input type="checkbox"/> Copy of the Contractor/Subcontractor Verification Form (certifying they are not debarred) |
| <input type="checkbox"/> Supplies/Materials – For procurement under \$250,000 - documentation of all quotes solicited and received (phone, email, etc.) and justification of selection |
| <input type="checkbox"/> BABA Compliance Documentation |
| <input type="checkbox"/> Professional Services – Copy of RFP, publisher’s affidavit, documentation of MBE/WBE solicitation, copies of all responses, all review/evaluation documents, list of interviewed firms if applicable, justification of selected contractor(s) |
| <input type="checkbox"/> Construction Services – Copy of IFB, publisher’s affidavit for IFB advertisement, documentation of MBE/WBE/VBE solicitation, documentation of submission to trade publications, minutes from bid opening, copy of bid tabulation (certified by the project A/E), copy of notice of award, documentation of all bid rejections |
| Contracts |
| <input type="checkbox"/> Notice of Contract Award |
| <input type="checkbox"/> Executed contracts with all subrecipients or consultants/contractors that include all federal contract provisions, including HUD 4010 Labor Standards provisions if applicable |

CDBG Required Documentation Checklists

| Housing Programs |
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| <input type="checkbox"/> Copy of Pre-construction meeting checklist or minutes, if applicable |
| <input type="checkbox"/> Copy of all bonds (bid, payment, performance) |
| <input type="checkbox"/> Copy of prime contractors Certificate of Insurance to cover the cost of contract |
| <input type="checkbox"/> Documentation of Retainage Account, if applicable |
| <input type="checkbox"/> Documentation of all Change Orders |
| Individual Beneficiary Files |
| <input type="checkbox"/> Application and Executed Agreement |
| <input type="checkbox"/> Income verification including source documentation |
| <input type="checkbox"/> Demographics of household |
| <input type="checkbox"/> Copy of lien or use restriction per Program Guidelines (owner occupied and rental) |
| <input type="checkbox"/> Copy of affordable rent agreement (rental) |
| Reporting |
| <input type="checkbox"/> Financial reports and supporting documentation |
| <input type="checkbox"/> Activity reports and supporting documentation |
| <input type="checkbox"/> Lead clearance reports (if applicable) |
| Monitoring and Closeout |
| <input type="checkbox"/> Closeout Package |
| <input type="checkbox"/> Completion Report |
| <input type="checkbox"/> Section 3 supporting documentation |
| <input type="checkbox"/> HCD Monitoring Letter |
| <input type="checkbox"/> Monitoring Clearance Letter and evidence of corrective actions as applicable |
| <input type="checkbox"/> Unconditional releases of lien, as applicable |

CDBG Required Documentation Checklists

Housing Programs

- Underwriting analysis

*This list is designed to assist grantees in operating compliant programs, submitting required information to HCD, and maintaining thorough records. Not all documents will be applicable to all eligible activities under this activity type, and some Notices of Funding Availability (NOFA) may have alternative requirements not captured on this checklist. Should you have specific questions about CDBG recordkeeping please contact your HCD Representative.