

## **CDBG Required Documentation Checklists**

The following tables provide listings of required documentation for CDBG **Public Services** 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.

<b>Public Service</b>
<b>Documentation to be collected PRIOR to Standard Agreement Issuance</b>
<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
<b>Documentation to be Collected BEFORE FIRST DRAW</b>

## CDBG Required Documentation Checklists

<b>Public Service</b>
<input type="checkbox"/> Executed subrecipient agreement or contract if applicable (includes project description/scope of work, timetable, budget, milestones, subrogation agreement)
<input type="checkbox"/> Final Program Guidelines
<input type="checkbox"/> SAM.gov Excluded parties review of subrecipients, contractors, and first tier subcontractors
<b>Documentation FOR EACH DRAW REQUEST/Financial Report (including first and last)</b>
<input type="checkbox"/> Financial Report cover sheet: total contract amount, amount requested, retainage (if any), amount remaining
<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: Invoices should include business name, description of costs, rates/charges, and project location address if applicable in accordance with the service contract with the contractor.
<input type="checkbox"/> Approved facility costs (appropriate documentation) such as rent or mortgage and utilities along with the documentation of the pro rata share if applicable.
<input type="checkbox"/> Invoices for supplies and equipment
<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.
<b>Documentation FOR Award Closeout a.k.a. “Financial Report (Closeout)” in eCivis GMS</b>
<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

## CDBG Required Documentation Checklists

<b>Public Service</b>
<b>Documentation Retained in Local Files*</b>
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"/> LMA – map of boundaries of service area, census data or survey showing service area is at least 51% LMI.
<input type="checkbox"/> LMC Presumed Group - Documentation that the activity served the presumed population(s) stated in the application.
<input type="checkbox"/> LMC 51% - documentation that 51% of all persons assisted are LMI (applications, intake documents, documentation of need for assistance, etc.).
<input type="checkbox"/> LMC Nature and location – documentation/verification that the nature and location of the activity as approved did not change.
<input type="checkbox"/> LMH – documentation that at least 51% of all households served were LMI (applications, intake documents, income verification, etc.).
Environmental Review
<input type="checkbox"/> Scope of work for the program
<input type="checkbox"/> Environmental Review Certificate of Exemption/Categorically Excluded Format signed by Certifying Officer
Public Participation
<input type="checkbox"/> Citizen 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)

## CDBG Required Documentation Checklists

Public Service
<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)
<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"/> Approved Indirect Cost Rate (if applicable)
Procurement (for each procurement utilizing CDBG funds)
<input type="checkbox"/> Procurement packages for any procurements to be funded from grant
<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

## CDBG Required Documentation Checklists

Public Service
<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)
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
Reporting
<input type="checkbox"/> Financial reports and supporting documentation
<input type="checkbox"/> Activity reports and supporting documentation
<input type="checkbox"/> Copy of HUD Disclosure Form 2880 Updates, if applicable
Monitoring and Closeout
<input type="checkbox"/> Closeout Package
<input type="checkbox"/> Completion Report
<input type="checkbox"/> HCD Monitoring Letter
<input type="checkbox"/> Monitoring Clearance Letter and evidence of corrective actions as applicable

\*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.