

CDBG Required Documentation Checklists

The following tables provide listings of required documentation for CDBG **Administrative and Planning** activities. A separate list is provided for each of the primary activities. The document details the types of proof that are 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 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.

General Administration
Documentation Required Prior to Standard Agreement
<input type="checkbox"/> Completed Application
<input type="checkbox"/> Resolution
<input type="checkbox"/> Budget
<input type="checkbox"/> Environmental Review Record (Signed and dated Certificate of Exempt or Categorical Exclusion Format)
<input type="checkbox"/> Draft Consultant Contract or Subrecipient Agreement (as applicable)
Documentation to be Collected BEFORE FIRST DRAW
<input type="checkbox"/> SAM.gov Excluded parties review of subrecipients, contractors, and first tier subcontractors

CDBG Required Documentation Checklists

General Administration
<ul style="list-style-type: none"> <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.
Documentation FOR EACH DRAW REQUEST (including first and last)
<ul style="list-style-type: none"> <input type="checkbox"/> Financial Report cover sheet: total contract amount, amount requested, retainage (if any), amount remaining
<ul style="list-style-type: none"> <input type="checkbox"/> Invoices detailed according to contract language (note: In order to expedite the payment process, HCD will generally reimburse upon receipt of invoices from contractors. Documentation that the Grantee has paid the contractor or subrecipient may be requested at any time and will be reviewed at monitoring.)
<ul style="list-style-type: none"> <input type="checkbox"/> Payroll documentation for all municipal staff and subrecipients working on the project (timesheets, payroll system reports, etc.) Reports should include name, title, hours worked, time period, description of work, and rate of pay and/or total cost. If this information is not generated in Grantee's payroll system, supplemental documents (e.g. Excel spreadsheet) may be submitted.
<ul style="list-style-type: none"> <input type="checkbox"/> For any payment made to a subrecipient or contractor, ensure that executed contract and SAM.gov registration was previously submitted. If not, submit with financial report. (Note: this is not applicable to one-time vendors such as news outlets billing for public notice posting)
<ul style="list-style-type: none"> <input type="checkbox"/> Source documentation for any project-related costs from the approved budget that are incurred by the Grantee directly.
<ul style="list-style-type: none"> <input type="checkbox"/> Narrative field in the GMS Financial Report should thoroughly explain submitted documentation
<ul style="list-style-type: none"> <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
<ul style="list-style-type: none"> <input type="checkbox"/> Closeout Package
<ul style="list-style-type: none"> <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)
<ul style="list-style-type: none"> <input type="checkbox"/> Proof of posting for Closeout Final Hearing
<ul style="list-style-type: none"> <input type="checkbox"/> Copy of completed plan, report, or documentation of completion of other CDBG eligible activity for Administration.

CDBG Required Documentation Checklists

General Administration
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"/> Correspondence related to grant administration (decisions made, approvals issued, waivers, etc.)
National Objective (for Planning Activities)
<input type="checkbox"/> See above in Final Invoice/Closeout section to know what records to maintain
Environmental Review
<input type="checkbox"/> Scope of work
<input type="checkbox"/> Environmental Review Certificate of Exemption/Categorically Excluded Format signed by Certifying Officer
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"/> 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"/> Copies of all contractor/vendor invoices

CDBG Required Documentation Checklists

General Administration
<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 consultants/contractors to be funded from grant
<input type="checkbox"/> Procurement policies and procedures
<input type="checkbox"/> Copy of conflict-of-interest policy
<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"/> 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

CDBG Required Documentation Checklists

General Administration
<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.