

RECORDKEEPING

RESOURCES

CONSULT THE CoC RULE

CoC Program Interim Rule – 578.103

Recordkeeping Requirements:

<https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml#seqnum578>

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SUMMARY

Recipients and subrecipients must maintain complete, up-to-date written records and procedures for each CoC Program-funded project. They are required to:

- Establish and maintain standard operating procedures to ensure that program funds are used in accordance with regulatory and CoC Program NOFA requirements; and
- Maintain sufficient records to enable HUD to determine whether recipients and subrecipients are adhering to regulatory and other applicable requirements.

RECORDKEEPING REQUIREMENTS

The following is a list of required documentation for each grant, housing unit or facility, and program participant. **Recipients and subrecipients must carefully review the [CoC Program Interim Rule](#) (see sidebar) for details.**

CONFIDENTIALITY OF RECORDS

In addition to meeting the confidentiality and security requirements for HMIS data, the recipients and subrecipients must develop and implement written procedures to ensure:

- All records containing protected identifying information of any individual or family that applies for and/or receives CoC Program assistance will be kept secure and confidential;
- The address or location of any family violence project assisted with CoC Program funds will not be made public, except with written authorization of the person responsible for the operation of the project; and
- The address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

RECORD RETENTION

All records pertaining to CoC Program funds must be retained for **at least five years** from the final expenditure of grant funds.

Where CoC Program funds are used for acquisition, new construction, or rehabilitation of a project site, records must be retained for **15 years** after the date that the project site was first occupied, or used, by program participants.

Copies (paper or electronic) may be substituted in place of the original records. See requirements checklist below.

AGENCY LEVEL REQUIREMENTS

- Standard Operating Procedures for use of CoC Program funds
- Organization's conflict of interest policy and procedures
- Verification of the participation of homeless person(s) on the board of directors or equivalent policymaking body
- Compliance with faith-based activity requirements and restrictions
- Marketing, outreach, and related materials to show compliance with Affirmatively Furthering Fair Housing
- Other Federal Requirements:
 - Environmental Review
 - Solid Waste Disposal Act, Section 6002
 - Transparency Act Reporting
 - Coastal Barrier Resources Act of 1982
 - Uniform Administrative Requirements
 - Lead-based Paint
 - Audit
 - Section 3 of the Housing and Urban Development Act of 1968 and its implementing regulations at 24 CFR part 135
- Project-specific Policies and Procedures for program operation
- Match commitments and records of actual match
- Annual assessment of services offered within projects, including any changes
- Project application
- Issues and Conditions related to project
- Grant Agreement and any related amendments
- Subrecipient agreement (if applicable) including required certifications, payment records, and verification of annual monitoring
- Project changes, both major and minor
 - Housing/Property Requirements
 - Housing Quality Inspection (HQS) report(s)
 - Certificate of Occupancy (if applicable)
 - Confirmation of lead-based paint disclosures
 - Environmental review verification

PROGRAM PARTICIPANT REQUIREMENTS

- Verification of eligibility including homeless and disability status (if applicable)
- Lease, sublease, or occupancy agreement(s)
- Income documentation and calculation of rent or occupancy charges (if applicable)
- Services provided to the participant
- Annual service assessment
- Reasonable belief of imminent threat of harm for households moved outside of CoC geography
- Proof of due process (if terminated)