

Section 4

Records Management

Section 4 – Records Management

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Section 4 - Records Management

1.0 Introduction

The grantee must maintain all program and project-related documentation such as financial records, supporting documents, and statistical records. These records must be retained for a period of five years after closeout of the State’s Disaster Recovery grant by HUD.

2.0 Project File Availability

The filing system the grantee establishes to keep records should be easy to use while providing a historical account of activities for examination and review by the OCD-DRU, auditors, and local grantee staff. The Disaster Recovery CDBG records are subject to the Freedom of Information Act and relevant state laws regarding public availability.

3.0 Logistics

The filing system should be established on a project basis. Files should, to the extent possible, be maintained in a central location.

4.0 Establishing Project Files

The checklist below is a sample of the major file categories that should be maintained and a listing of materials that should be kept in each file. This list is not all inclusive. Although a consultant may maintain a set of files in his/her office, the grantees are required to maintain the original files at their location.

4.1 Grant and Project Approval Files

Files to Maintain	Notes/Dates
Grant and Project Approval (<i>Refer to Manual Section 1 and Section 2</i>) <input type="checkbox"/> Letter from the OCD-DRU awarding grant <input type="checkbox"/> Request for Project Amendment Form <input type="checkbox"/> Contract Agreement and any Contract Amendments <input type="checkbox"/> Records of correspondence concerning other contract conditions	

4.2 Citizen Participation Files

Files to Maintain	Notes/Dates
<p>Citizen Participation (<i>Refer to Manual Section 2</i>)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Copy of all notices of public hearings held and proofs of publication relating to the Disaster Recovery CDBG program <input type="checkbox"/> List of persons attending public hearings and minutes of the meetings <input type="checkbox"/> Citizen inquiries and complaints and correspondence responding to the inquiries and complaints <input type="checkbox"/> Copy of Citizen Participation Plan with adopting resolution. Records documenting implementation and compliance with the CP Plan <input type="checkbox"/> Citizen Complaint Procedures 	

4.3 Project Activity Files

Files to Maintain	Notes/Dates
<p>Project Activity (<i>Refer to Manual Section 2</i>)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Applications providing a full description of each activity taken <input type="checkbox"/> Records demonstrating that each activity undertaken meets one of the National Objectives of the Disaster Recovery CDBG program 	

4.4 Construction Project Files

Files to Maintain	Notes/Dates
<p>Construction Projects (<i>Refer to Manual Section 2 and Section 6</i>)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Special studies, surveys, investigations, tests results, et cetera <input type="checkbox"/> Copy of Preliminary design and cost estimates which were included within application <input type="checkbox"/> Final design documents and cost estimates <input type="checkbox"/> Evidence that all land, rights-of-ways, and easements have been obtained prior to advertising project for bids; should include highway permits and railroad crossing permits as applicable <input type="checkbox"/> Transmittal to OCD-DRU of plans and specifications to review <input type="checkbox"/> Receipt and authorization from OCD-DRU to advertise 	

Files to Maintain	Notes/Dates
<ul style="list-style-type: none"> <input type="checkbox"/> Advertisements for bids <input type="checkbox"/> Bid documents <input type="checkbox"/> Evidence of submittal to and/or review by cognizant state or federal agency having jurisdiction over project <input type="checkbox"/> Conformance with Architectural Barriers Act, if applicable <input type="checkbox"/> List of proposed bidders and suppliers receiving copies of the bid documents <input type="checkbox"/> Minutes of public bid opening <input type="checkbox"/> Tabulation of bids with copy of the bid proposal <input type="checkbox"/> Bidder qualification information; verification of contractor license <input type="checkbox"/> Notice of award of the contract to the lowest responsible bidder <input type="checkbox"/> Notice to Proceed <input type="checkbox"/> Cost breakdown, if required <input type="checkbox"/> Evidence of contractor and subcontractor verification of eligibility and approval <input type="checkbox"/> Architect/engineer inspection reports or project status reports, field measurements and test results (“Construction Inspection Reports”) <input type="checkbox"/> Records of claims, disputes, et cetera <input type="checkbox"/> Change orders and field orders with supporting documentation and justification <input type="checkbox"/> Final inspection and acceptance of project <input type="checkbox"/> Clear lien certificate and final payment to contractor <input type="checkbox"/> As-built drawings <input type="checkbox"/> Correspondence, memoranda, and other records that may relate to construction contracts <input type="checkbox"/> Verification of contractors' compliance with Section 3 (of the HUD Act of 1968) regulations <input type="checkbox"/> Comprehensive Construction Contract Checklist (See Sample in Exhibit 2-4) 	

4.5 Financial Management Files

Files to Maintain	Notes/Dates
<p>Financial Management (<i>Refer to Manual Section 5</i>)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Authorized Signature Form <input type="checkbox"/> Financial Management Questionnaire (mailed with “Application Revision Letter”) <input type="checkbox"/> Electronic Funds Transfer Enrollment Form 	

Files to Maintain	Notes/Dates
<input type="checkbox"/> Process to Change forms <input type="checkbox"/> Requests for Payment <input type="checkbox"/> General-purpose Financial Statements (Statement Of Revenues, Expenditures And Changes In Fund Balance And A Balance Sheet) <input type="checkbox"/> Record of commitment of other funds <input type="checkbox"/> Source documentation (contracts, purchase orders, vouchers, invoices, requests for partial payment, etc.) <input type="checkbox"/> Support documentation (canceled checks, deposit slips, monthly bank statements, etc.) <input type="checkbox"/> Grantee Code of Ethics <input type="checkbox"/> Grantee audits	

4.6 Audit Files

Files to Maintain	Notes/Dates
<p>Audit (Refer to Manual Section 5 and Section 6)</p> <input type="checkbox"/> Method utilized to procure audit firm(s) <input type="checkbox"/> Professional Services Agreement with independent CPA (“written engagement agreement”) <input type="checkbox"/> Financial Reports <input type="checkbox"/> Information relating to Financial Reports costs <input type="checkbox"/> Data collection Form and Reporting Package add <input type="checkbox"/> Financial Reports required if Single Audit is not done <ul style="list-style-type: none"> <input type="checkbox"/> Annual sworn financial statements if revenue received was \$50,000 or less, <input type="checkbox"/> An annual compilation if revenue received was more than \$50,000 but less than \$200,000, <input type="checkbox"/> An annual review to be accompanied by an attestation report, if revenue received was \$200,000 or more but less than \$750,000, or <input type="checkbox"/> An annual audit if revenue received was \$750,000 or more. <input type="checkbox"/> Independent Audit Results, Support Documentation, and Corrective Actions <u>Force Account, if required</u> <input type="checkbox"/> Contact the OCD-DRU for record keeping requirements with respect to force account.	

4.7 Procurement Files

Files to Maintain	Notes/Dates
<p>Procurement (Refer to Manual Section 6)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Adopted procurement policy <input type="checkbox"/> All Contracts <input type="checkbox"/> Amendments to contracts (if applicable) <input type="checkbox"/> Task Orders and/or change orders (if applicable) <input type="checkbox"/> Methods and procedures for procurement transactions <input type="checkbox"/> Negotiation methodologies <input type="checkbox"/> Excess Cost (Bid) Procedures (for when bids exceed cost estimates) <input type="checkbox"/> Evidence of Grantee's attempt to identify and solicit minority contractors and vendors and documentation to support "good faith effort" <input type="checkbox"/> Cost and price detail summaries ("Cost/Price Detail Summary form") <input type="checkbox"/> Notice of Contract Awards <input type="checkbox"/> Verification form(s), if applicable <input type="checkbox"/> Contractor certifications <input type="checkbox"/> Bonding and Insurance forms <p><u>For all services procured through the Small Purchase Method:</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Price or rate quotations from at least three sources <input type="checkbox"/> Written documentation of businesses contacted and basis for selection <p><u>For all services procured through the Competitive Sealed Bids Method:</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Bid Package, applicable (materials, supplies, construction services only) <input type="checkbox"/> Minutes from Public Bid Opening, if applicable (materials, supplies, construction services only) <input type="checkbox"/> Written reason for rejecting any or all bids <p><u>For all services procured through Competitive Negotiation:</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> RFQ and/or RFPs, if applicable (professional services only) <input type="checkbox"/> Advertisement of RFP/RFQ <input type="checkbox"/> All responses (offers) to Advertisement, RFQ and/or RFPs received <input type="checkbox"/> Written review and evaluation of responses (offers) received 	

Files to Maintain	Notes/Dates
<p><u>For all services procured through Non-Competitive Negotiation:</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Written approval from OCD <input type="checkbox"/> Advertisement of RFP/RFQ <input type="checkbox"/> Response (offer) to Advertisement, RFQ and/or RFPs received <input type="checkbox"/> Written review and evaluation of responses (offers) received <input type="checkbox"/> Written documentation of negotiation with firm 	

4.8 Labor Standards Files

Files to Maintain	Notes/Dates
<p>Labor Standards (<i>Refer to Manual Section 7</i>)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Designation of a local Labor Standards Compliance Officer <input type="checkbox"/> Federal Labor Standards Provisions <input type="checkbox"/> Evidence of apprenticeship/trainee registration and certification if apprentice or trainee rates were paid <input type="checkbox"/> Employee interviews <input type="checkbox"/> Evidence indicating that the federal wage determination and the Labor, E.O., and Safety posters were posted <input type="checkbox"/> Complaints from workers, if any, and actions taken <input type="checkbox"/> Labor Standards Compliance Report(s), if any <input type="checkbox"/> Final Wage Compliance Report <input type="checkbox"/> Traceable Correspondence of Liquidated Damages add <input type="checkbox"/> Supplementary Statement add <input type="checkbox"/> Labor Standards Enforcement Report add <input type="checkbox"/> Grantee Notification of Underpayment or Withholding <p><u>Wage Determination</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Request for Wage Determination <input type="checkbox"/> Wage Rate Decision (includes Invitation for Bids (IFB), Request for Proposal (RFP) and Purchase Order (PO) if applicable) <input type="checkbox"/> Project Wage Rate Sheet(s) <input type="checkbox"/> Evidence of the 10-day call <input type="checkbox"/> Wage determinations modifications and additional classifications with Supplemental Agreement 	

Files to Maintain	Notes/Dates
<p><u>Payroll</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Payroll deduction authorizations <input type="checkbox"/> Evidence of restitution, if any <input type="checkbox"/> Apprenticeship papers for all Contractors/Subcontractors utilizing apprentices <input type="checkbox"/> Trainees papers for all Contractors/Subcontractors utilizing trainees <input type="checkbox"/> Contractor's/Subcontractor's New Employee Information Form <input type="checkbox"/> Contractor's/Subcontractor's Existing Employee Information Form <input type="checkbox"/> Contractor's and subcontractor's weekly payrolls <input type="checkbox"/> Corrected Payroll, if applicable <input type="checkbox"/> Certified Correction Payroll, if applicable <input type="checkbox"/> Statements of Compliance signed by an officer of the company <input type="checkbox"/> Fringe Benefit Verification <ul style="list-style-type: none"> <input type="checkbox"/> Payroll Form/Statement of Compliance: fringe benefits must be marked <input type="checkbox"/> Supplementary Signed Statement for fringe benefits if not using previous forms 	

4.9 Civil Rights Files

Files to Maintain	Notes/Dates
<p>Civil Rights (Refer to Manual Section 8)</p> <p><u>Section 3 of the HUD Act of 1968</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Section 3 of the HUD Act of 1968 Complaint Form <input type="checkbox"/> Fair Housing activity (incl. Utility Bill Stuffer and a Fair Housing flyer) <input type="checkbox"/> Section 3 of the HUD Act of 1968 Employment activity <input type="checkbox"/> Section 3 of the HUD Act of 1968 Contracting activity <p><u>Equal Opportunity</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Equal Opportunity Records <input type="checkbox"/> Employment and Training, Construction and Non-construction Report <p><u>Section 504</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Self-evaluation with all areas examined 	

Files to Maintain	Notes/Dates
<ul style="list-style-type: none"> <input type="checkbox"/> List of interested persons consulted <input type="checkbox"/> Transition Plan (if applicable) <input type="checkbox"/> Summary of Previous Actions Taken to Achieve Compliance with Section 504 <input type="checkbox"/> Description of modifications made, or to be made, whether administratively or physically <input type="checkbox"/> Designation of responsible person to coordinate Section 504 (if 15 or more employed) <input type="checkbox"/> Grievance Procedure (if 15 or more persons are employed) - relating specifically to Section 504 <input type="checkbox"/> Notices Required (if 15 or more persons are employed) <input type="checkbox"/> Statement of Policy to be used with published or recruitment materials or publications of general information <input type="checkbox"/> Method for ensuring participation by those likely to be affected by the Disaster Recovery CDBG Program who have visual or hearing impairments <input type="checkbox"/> Procedures which ensure that interested persons (including those with visual or hearing impairments) can obtain information on the existence and location of accessible services, activities, and facilities <input type="checkbox"/> Employment/Personnel Practices <input type="checkbox"/> Data which shows the extent to which handicapped individuals are benefitting from the Disaster Recovery CDBG program <input type="checkbox"/> Section 504 Assurance 	

4.10 Environmental Review Files

Files to Maintain	Notes/Dates
<p>Environmental Review Record (<i>Refer to Manual Section 9</i>)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Environmental Review Record (ERR) <input type="checkbox"/> Certified Environmental Findings and Records <input type="checkbox"/> Finding of Exemption <ul style="list-style-type: none"> <input type="checkbox"/> Documentation <input type="checkbox"/> Certification of Exemption for HUD-funded Projects (Exhibit 9-1) <input type="checkbox"/> Confirmation from the OCD-DRU 	

Files to Maintain	Notes/Dates
<input type="checkbox"/> Finding of Categorical Exclusion (if applicable) <ul style="list-style-type: none"> <input type="checkbox"/> Documentation <input type="checkbox"/> Confirmation from the OCD/DRU <input type="checkbox"/> Statutory checklist <input type="checkbox"/> Project description <input type="checkbox"/> Environmental Assessment/Checklist (if applicable) <input type="checkbox"/> ERR Project Map with boundaries marked <input type="checkbox"/> Floodplain Map (if applicable) <input type="checkbox"/> Floodplain Notices/8-step documentation (if applicable) <input type="checkbox"/> US Corps of Engineers letters (to and from / if applicable) <input type="checkbox"/> State Historic Preservation letters (to and from) <input type="checkbox"/> Farmland Conversion Impact Rating form (if applicable) <input type="checkbox"/> Historic Preservation Housing Rehab Certifications (for housing activities only) <input type="checkbox"/> Statutory Checklist Completion Forms (for housing activities only) <input type="checkbox"/> Notice of Intent to Request Release of Funds OR Combined Notice of Finding of No Significant Impact and of Intent to Request a Release of Grant Funds <input type="checkbox"/> Notice of FONSI distribution list <input type="checkbox"/> Finding of No Significant Impact (FONSI) <input type="checkbox"/> Finding of Significant Impact (FOSI) <input type="checkbox"/> Request for Release of Funds and Certification <input type="checkbox"/> Notice of Release of Funds <input type="checkbox"/> All letters related to ERR process <input type="checkbox"/> Any required permits	Notes/Dates

4.11 Acquisition Files

Files to Maintain	Notes/Dates
Acquisition (Refer to Manual Section 10) <input type="checkbox"/> Voluntary Acquisition Policy <input type="checkbox"/> Intent Not to Acquire, if applicable <input type="checkbox"/> Waiver for Donated Property, if applicable	

- Quick-take forms, if applicable
- List identifying all parcels to be acquired for the project (“Acquisition Composite List”)

For each parcel, easement, or right-of-way acquired or obtained:

- Identification of property and property owner(s),
- Determination of ownership,
- If applicable, evidence that owner received a Preliminary Acquisition Notice accompanied by the notice entitled “When a Public Agency Acquires Your Property”,
- A copy of valuation for each parcel obtained by purchase whether by appraisal or opinion of a knowledgeable person,
- If applicable, a Statement of the Basis For the Determination of Just Compensation
- If applicable, a copy of the written purchase offer and documentation of the date of delivery,
- If applicable, as in the case of a donation, a Property of Servitude Acquisition Waiver,
- Record of negotiations with the property owner,
- Acquiring agency’s administrative settlement and supporting documentation,
- Copy of a Contract of Sale or Act of Donation,
- Copy of a Statement of Settlement Costs and evidence (via a copy of a cancelled check) that the owner received net proceeds (if applicable) due from sale,
- Copy of recordation at the appropriate parish courthouse,
- If applicable, a copy of an appeal or complaint filed and Agency response.

Persons Not Displaced (Refer to Manual Section 10)

For each person not displaced:

- Evidence that the person received timely written notice that he/she would not be displaced by the project;
- Evidence that tenants occupying a dwelling received a timely offer of: (a) a reasonable opportunity to lease and occupy a suitable, affordable, decent, safe and sanitary dwelling on the real property and (b) reimbursement of any out-of-pocket expenses incurred in connection with any temporary relocation or a move to another unit on the real property;
- For each occupant that is not displaced but elects to move permanently from the real property, indicate the reason for the move and any personal contact to explain that the person will not qualify for relocation payments as a "displaced person".

Displaced Persons (Refer to Manual Section 10)

- Identification of the person's name, address, racial/ethnic group classification and date of initial occupancy. For residential tenant-occupants, include age, sex, and income of all members of the household and monthly rent and utility costs. For homeowners, include Agency "acquisition cost" of unit. For nonresidential occupants, include type of enterprise;

Files to Maintain	Notes/Dates
<ul style="list-style-type: none"> <input type="checkbox"/> Evidence that person received timely written notice of possible displacement and a general description of the relocation payments and advisory services for which he/she may be eligible, basic eligibility conditions and the procedures for obtaining payments; <input type="checkbox"/> Evidence that person received timely written notice of eligibility for relocation assistance and, for those displaced from a dwelling, the specific comparable replacement dwelling and the related cost to be used to establish the upper limit of the replacement housing payment; <input type="checkbox"/> Identification of relocation needs and preferences, dates of personal contacts and services provided; <input type="checkbox"/> Identification of referrals to replacement properties, date of referral, rent/utility costs or sale price (if dwelling), date of availability, reason(s) person declined referral; <input type="checkbox"/> Copy of 90-day notice and vacate notice, if issued; <input type="checkbox"/> Identification of actual replacement property, rent/utility costs or sale price (if dwelling) and date of relocation; <input type="checkbox"/> Copy of replacement dwelling inspection report showing condition of unit and date of inspection; <input type="checkbox"/> Copy of each approved claim form and related documentation, evidence that person received payment, and if applicable, Section 8 Certificate or Housing Voucher; <input type="checkbox"/> Copy of any appeal or complaint filed and grantee response. 	

4.12 Demolition Files

Files to Maintain	Notes/Dates
<p>Demolition (<i>Refer to Manual Section 10</i>)</p> <p>For each property demolished, excluding Reconstruction:</p> <ul style="list-style-type: none"> <input type="checkbox"/> A file for each unit demolished <input type="checkbox"/> Evidence that demolition was carried out in accordance with the requirements under La. R.S. 33:4765/et.seq. <input type="checkbox"/> Proof that the unit was not able to be rehabilitated in a cost efficient manner. (Photos or written Section 8 checklists, other documentation) <input type="checkbox"/> Proof that the unit was vacant prior to demolition. 	

4.13 Relocation Case Files

Files to Maintain	Notes/Dates
<p>Relocation Case Files (<i>Refer to Manual Section 10</i>)</p> <ul style="list-style-type: none"> <input type="checkbox"/> URA Policy <input type="checkbox"/> Claim form(s) <ul style="list-style-type: none"> <input type="checkbox"/> Claim for Fixed Payment in Lieu of Payment for Actual Reasonable Moving and Related Expenses <input type="checkbox"/> Claim for Moving Costs <input type="checkbox"/> Claim for Replacement Housing Payment for Homeowners <input type="checkbox"/> Claim for Rental Assistance or Down payment Assistance <input type="checkbox"/> Acknowledgement of Receipt of Relocation Payments <p>For each relocation claim:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Evidence and dates of personal contacts; and description of services provided. <input type="checkbox"/> Identification of person, displacement property, racial/ethnic group classification, age and sex of all members of household, monthly rent and utility costs for displacement and replacement housing, type of enterprise, and relocation needs and preferences. <input type="checkbox"/> Notice of Eligibility for Relocation Assistance <input type="checkbox"/> Notice of Non-displacement <input type="checkbox"/> Recipient Interview and Survey (Household Case Record form for replacement-housing needs) <input type="checkbox"/> Identification of referrals to replacement properties, date of referral, sale price or rent/utility costs (if dwelling), date of availability, and reason(s) for declining referral. <input type="checkbox"/> Copy of 90-day notice and vacate notice, if issued. <input type="checkbox"/> Identification of actual replacement property, sale price or rent/utility costs (if dwelling), and date of relocation. <input type="checkbox"/> Replacement dwelling inspection report; and date of inspection. <input type="checkbox"/> A copy of each approved claim form and related documentation; evidence that the person received payment. <input type="checkbox"/> Copy of any appeal or complaint filed and recipient's response. <input type="checkbox"/> Copy of deferred loan lien agreement that has been filed with the clerk of courts office <p><u>Business Relocation</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> General Information Notice (GIN) <input type="checkbox"/> Notice of Interest (Notice to Owner) 	

Files to Maintain	Notes/Dates
<input type="checkbox"/> Relocation Eligibility (NOE)	

4.14 Property Management Files

Files to Maintain	Notes/Dates
<p>Property Management</p> <input type="checkbox"/> Grantee Agreement/CEA <input type="checkbox"/> Physical Inventory and Reconciliation of Inventory records on Property Control Tracking log (See Exhibit 11-1) <input type="checkbox"/> Proof of Adequate maintenance and control <input type="checkbox"/> Proper sales procedures <input type="checkbox"/> Equipment records <input type="checkbox"/> Equipment of Disposition	

4.15 State Monitoring/Inspection Files

Files to Maintain	Notes/Dates
<p>State Monitoring/Inspections (Refer to Manual Section 12)</p> <input type="checkbox"/> State letter(s) of findings <input type="checkbox"/> Grantee response to letter of findings <input type="checkbox"/> State's response clearing findings <input type="checkbox"/> Other correspondence related to the OCD-DRU's monitoring visits	

4.16 Project Close-out Files

Files to Maintain	Notes/Dates
<p>Project Close-out (Refer to Manual Section 13))</p> <input type="checkbox"/> Project Completion Report <input type="checkbox"/> Conditional Project Close-out letter from OCD-DRU <input type="checkbox"/> Final Project Close-out letter from OCD-DRU <input type="checkbox"/> Certificate of Completion Forms <input type="checkbox"/> Clear Lien Certificate <input type="checkbox"/> Construction Contract Change Orders	

Files to Maintain	Notes/Dates
<input type="checkbox"/> Grantee/CEA Final Performance Report <input type="checkbox"/> Grantee/CEA Close-out letter from OCD-DRU	

4.17 Lead-Based Paint Files

Files to Maintain	Notes/Dates
<p>Lead-Based Paint Files (<i>Refer to Manual Section 14</i>)</p> <input type="checkbox"/> Documentation that tenants were provided with Lead Hazard Pamphlet or an EPA-approved equivalent <input type="checkbox"/> Documentation that the disclosure form was included in the lease packet and was signed by the tenant prior to executing a lease. <input type="checkbox"/> Documentation that a lead-based paint evaluation or assessment was performed on any housing project (buildings built prior to 1977 only) <input type="checkbox"/> Proof of Lead Hazard Reduction work <input type="checkbox"/> Proof of ongoing maintenance activities, if required <input type="checkbox"/> Documentation that safe work practices were followed for all maintenance and renovation work that disturbs paint that may be lead-based paint above the de-minimus level.	

4.18 General Compliance Files

Files to Maintain	Notes/Dates
<p>General Correspondence</p> <input type="checkbox"/> Incoming and outgoing correspondence that does not fall into the above categories or into a specific project file category	

4.19 Specific Requirements for Hurricane Isaac Allocation

Files to Maintain	Notes/Dates
<p>Green Building Standards</p> <input type="checkbox"/> Documentation certifying achievement of ENERGY STAR, Enterprise Green Communities, LEED, ICC-700, EPA Indoor AirPlus, or other equivalent green building program OR completion of the HUD CPD Green Building Retrofit Checklist	