



# Recordkeeping Requirements

24 CFR 578.103

2 CFR 200.302 (b)

2 CFR 200.333-337





## In General

- Recipient and its subrecipients must establish and maintain:
  - Standard operating procedures for ensuring that CoC program funds are used in accordance with CoC program requirements
  - Sufficient records to enable HUD to determine whether recipient and its subrecipients are meeting requirements CoC program requirements



## In General

- Recipients and its subrecipients must:
  - Obtain documentation from qualified source(s) in accordance with requirements of interim rule
  - Maintain records in your organization, project and program participant files
- For required records, see 578.103(a)



# Confidentiality

- All records containing protected information must be kept secure and confidential
- Address or location of any program participant must not be made public
- See 24 CFR 578.23(b)(4)(i)
- See 2 CFR 200.79 and .82
- See 2 CFR 200.302(b)
- See 2 CFR 200.303(e)
- See 2 CFR 200.337
- See 2 CFR 200.512(2)



# Confidentiality

- In addition to meeting specific confidentiality and security requirements for HMIS data, recipient must develop and implement written procedures to ensure:
  - (1) All records containing protected identifying information of any individual or family who applies for and/or receives CoC assistance will be kept secure and confidential; and



## Confidentiality

- (2) Address or location of any family violence project assisted with CoC funds will not be made public, except with written authorization of person responsible for operation of project; and
- (3) Address or location of any housing of participant will not be made public, except as provided under preexisting privacy policy of recipient and consistent with State and local laws regarding privacy and obligations of confidentiality



## Period of Record Retention

- All non-construction records must be retained for at least 5 years
- Participant eligibility documentation must be retained for 5 years after final expenditure of funds of relevant grant
- Acquisition, new construction or rehabilitation records must be retained for 15 years after date project site is first occupied or used by participants



# Access to Records

- Federal Government rights:
  - HUD has right of access to all records of recipient and its subrecipients pertinent to CoC grant, in order to make audits, etc.
- Public rights:
  - Recipient must provide citizens, public agencies and other interested parties reasonable access to records regarding any uses of CoC funds received during preceding 5 years, consistent with State and local laws regarding privacy and confidentiality and confidentiality requirements in Part 578





# Recordkeeping Requirements

- Key piece of overall program management is documentation
- Keeping good records:
  - Documents program accomplishments
  - Allows recipients to track what is and is not working
  - Enables recipients and HUD to measure effectiveness of services provided
  - Makes it easier and quicker to apply for funds and report compliance to funders



# Recordkeeping Requirements

CoC Records

UFA Records

Homelessness  
Status

At Risk of  
Homelessness  
Status

Records of  
Reasonable  
Belief of  
Imminent Threat  
of Harm

Annual  
Income

Program  
Participant  
Records

Housing  
Standards

Services  
Provided

Match

Subrecipients  
and  
Contractors

Conflicts of  
Interest

Homeless  
Participation

Faith-based  
Activities

Affirmatively  
Furthering  
Fair Housing

Other Federal  
Requirements

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# Recordkeeping Requirements

- CoC program recordkeeping requirements by group document:
  - <https://www.hudexchange.info/course-content/coc-program-start-up-training-webinars-for-fy-2013-funds/CoC-Program-Startup-Training-FY2013-Recipients-Day1-Slides.pdf>
- Recordkeeping exercise:
  - <https://www.hudexchange.info/course-content/coc-program-start-up-training-webinars-for-fy-2013-funds/CoC-Program-Startup-Training-FY2013-Recipients-Recordkeeping-Documentation-Exercise.pdf>



## Other Resources

- CoC Program Toolkit – Grant Administration: Recordkeeping
- <https://www.hudexchange.info/programs/coc/toolkit/grant-administration>