

Louisiana Disaster Recovery and Mitigation Grant Implementation Manual

Chapter 3: Records Management



Louisiana Division of Administration

**Office of Community Development –
Disaster Recovery**

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1. Introduction

Effective recordkeeping is a cornerstone of compliance and accountability in the administration of Community Development Block Grant – Disaster Recovery (CDBG-DR) and Community Development Block Grant – Mitigation (CDBG-MIT) funds. Subrecipients are required to establish and maintain accurate, complete, and organized records that clearly document program eligibility, expenditures, compliance with federal and state requirements, contracts, and performance outcomes. This chapter outlines the minimum documentation standards, retention requirements, and best practices to ensure transparency, facilitate monitoring and audits, and support successful program closeout.

Records must be retained for a period of three years after closeout of the State’s CDBG-DR or CDBG-MIT grant by HUD. The record retention period for subrecipients does NOT begin when the Subrecipient Agreement between the subrecipient and the state is closed. LOCD-DR will notify subrecipients when a grant has been closed by HUD, including the specific date of the grant closeout and the retention period.

NOTE: There are exceptions that potentially require maintaining records longer than the three-year period.

- Relocation files must be maintained for three years after final project closeout or after the relocation payments, whichever is later per [49 CFR 24.9](#). If this time is after the State’s closeout of their grant with HUD, records must be maintained through the compliance period. (See Chapter 9)
- Property management files and national objective compliance files for real property acquired or improved with CDBG-DR or CDBG-MIT funds over \$25,000 must be maintained at least five years after the expiration of the CEA per [24 CFR 570.503\(b\)\(7\)](#). If the intended use of real property changes within the five-year compliance period, citizen participation files must be maintained showing their agreement per [24 CFR 570.489\(j\)](#).
- Files for property and equipment acquired with CDBG-DR or CDBG-MIT funds must be retained for three years after final disposition per [2 CFR 200.334\(c\)](#). If this time is after the State’s closeout of their grant with HUD, records must be maintained through the compliance period.
- Files for loan repayments or affordability compliance periods are required to be maintained per the applicable program policy.
- If any litigation, public information request, claim, or audit is started before the expiration of the record retention period, the records must be kept until the action has been resolved.

2. Project File Availability

Subrecipient files must be easy to use while providing a historical account of activities for examination and review by the LOCD-DR, auditors, and subrecipient staff. The CDBG-DR and CDBG-MIT records are subject to the Freedom of Information Act and relevant state laws regarding public availability.

3. Logistics

Establish the filing system on a project basis. Files should, to the extent possible, be maintained in a central location. Files can be maintained electronically. While a consultant may keep a set of files in their office, subrecipients are required to maintain the original files at their own location.

4. Establishing Project Files

Exhibit 3-1 is the Subrecipient File Checklist that outlines the major file categories, including the required documentation and materials that should be kept in each file. This list is not all inclusive. Review the program policy for any additional documentation that may be required.

5. LOCD-DR Exhibits

Exhibit	Description
Exhibit 3-1	Subrecipient File Checklist