City of Covington

Community Development Block Grant – Disaster Recovery (CDBG-DR) and Mitigation (CDBG-MIT)

Records Management Policy

SECTION 1: POLICY

The purpose of this policy is to provide a framework and assign responsibilities for ensuring that full and accurate records of the activities related to the City of Covington (the City) Community Development Block Grant Disaster Recovery (CDBG-DR) and Mitigation (CDBG-MIT) programs administered by the Louisiana Office of Community Development – Disaster Recovery (LOCD-DR) are created in accordance with the requirements of the U.S. Department of Housing and Urban Development and the State of Louisiana, Office of Community Development. The policy aims to ensure that these records are managed and maintained for as long as they are required to support the functions, activities and accountabilities required in accordance with the City's Cooperative Endeavor Agreement with the State of Louisiana, Office of Community Development, or any recognized agreement between the City and the CDBG-DR or CDBG-MIT program.

SECTION 2: SCOPE

This policy applies to all staff of the Grantee whether permanent or temporary, including consultants, contractors, and volunteers.

This policy applies to all activities performed by or on behalf of the City, in whatever manner they are conducted. This includes all written correspondence, whether paper or electronic, and all spoken transactions, including meetings and telephone calls. Equally, it covers all records of these activities regardless of the media in which they are captures.

SECTION 3: POLICY STATEMENT

The City is subject to the Public Records Law found in La. R.S. 44:1, et seq,. which provides for the maintenance and disclosure of public records and to the record keeping requirements of the State CDBG regulations found in 24 CFR 570.490. This requires the creation and maintenance of full and accurate records that support the day-to-day functions and activities of the Grantee related to the CDBG-DR and CDBG-MIT programs. These records provide evidence of these functions and activities and form part of the public record.

SECTION 4: GUIDELINES

1. **Records Management System** - The City maintains a records management system for all records related to the CDBG-DR and CDBG-MIT programs. Records may be maintained in hard copy, in electronic format in City-approved systems, or both. The key processes managed by this system include:

    a. the capture of all records;

    b. the storage of all records; and

    c. security and access to such records.

Physical files are stored in designated areas of the City's office. Electronic files are stored in City-approved systems with access limited to authorized staff.

The Grant Administrator, or designated alternate, is ultimately responsible for the operation and maintenance of the records management system of the City's CDBG-DR and CDBG-MIT programs.

2. Recordkeeping Principles - The City expects that:

a. All staff will create and maintain full and accurate records of all activity.

b. All public records will be captured into the central recordkeeping system in accordance with the best practice guidelines issued by the State of Louisiana Office of Community Development and according to the HUD Model Record Keeping Requirements Guide.

c. Staff may not keep public records in separate, individual filing systems, on personal devices or drives, or in personal email accounts outside the City's records management system.

d. All records will be named in accordance with the approved CDBG-DR classification scheme.

e. Physical files will be kept in the designated areas unless required for specific purposes. The location of physical files will be kept up-to-date at all times.

f. No staff member will dispose of public records unless authorized to do so.

g. Records will be retained as provided in Section 4.3.

3. Record Retention and Closeout

a. All CDBG-DR and CDBG-MIT records will be retained for a minimum of five (5) years after the U.S. Department of Housing and Urban Development (HUD) closes out the State of Louisiana's CDBG-DR or CDBG-MIT grant under which the activity was funded. The retention period begins on the date of HUD's closeout of the State's grant, not the date the City's Cooperative Endeavor Agreement or project is closed.

b. Records for real property acquired or improved with CDBG-DR or CDBG-MIT funds in excess of $25,000 will be retained for a minimum of five (5) years after the expiration of the Cooperative Endeavor Agreement, or the period in Section 4.3.a, whichever is later.

c. If any litigation, claim, audit, or monitoring finding is started before the retention period ends, the related records will be retained until all litigation, claims, audit findings, or monitoring findings have been resolved and final action taken.

d. Longer retention periods required by the Cooperative Endeavor Agreement, the LOCD-DR Grant Implementation Manual, or the City's approved records retention schedule will apply.

e. Before disposing of any CDBG-DR or CDBG-MIT records, the Grant Administrator will confirm in writing with LOCD-DR that HUD has closed out the State's grant and that the retention period has ended, and will keep that confirmation on file. Disposal will follow the City's approved records retention schedule.

SECTION 5: REGULATORY FRAMEWORK

Relevant legislation with which this policy complies includes:

1. La. R.S. 44:1, et seq
2. 24 CFR 570.490
3. 2 CFR 200.334 – 200.338
4. Louisiana Office of Community Development Policies and Procedures

SECTION 6: RESPONSIBILITIES

The Chief Elected Official of the City, or designated representative, is responsible for:

1. Ensuring compliance with legislative and regulatory requirements for recordkeeping;
2. Authorizing the recordkeeping policy;
3. Assigning responsibilities for recordkeeping;
4. Supporting recordkeeping within the CDBG-DR and CDBG-MIT programs;
5. Ensuring that the City policies support the creation and maintenance of full and accurate records of the CDBG-DR and CDBG-MIT programs' functions and activities;
6. Ensuring that the Grantee's recordkeeping policies and procedures will meet recommended practice guidelines and stand up to external scrutiny;
7. Ensuring that no illegal record disposal takes place;
8. Ensuring that all new staff receive records management induction; and
9. Monitoring staff compliance with the City's recordkeeping systems.

All City Staff are responsible for:

1. Complying with the City's documented records management policies and procedures;
2. Creating full and accurate records of activities, transactions, and decisions carried out during the course of daily activities;
3. Ensuring that such records are maintained by being captured into the City's records management system;
4. Handling such records shall be done with care and respect so to not damage or compromise their integrity;
5. Preventing unauthorized access to records; and
6. Ensuring that no records are destroyed or removed unless permitted by a current disposal authority.

SECTION 7: MONITORING AND REVIEW

This policy will be regularly monitored and reviewed to ensure that it remains relevant to the aims and requirements of the CDBG-DR and CDBG-MIT programs. Staff compliance with the policy and associated procedures will be monitored on an ongoing basis through staff self-assessment and by the Chief Elected Official, or authorized designee.

SECTION 8: CDBG-DR AND CDBG-MIT PROGRAMS

The City will follow the guidelines as described in the CDBG-DR Grantee Administrative Manual regarding record keeping.