

RECORDS RETENTION POLICY

This policy applies to all recipients and sub-recipients of Continuum of Care grant funds.

CONTINUUM OF CARE FUNDING RECORDS – Federal Funds:

All records pertaining to Continuum of Care funds will be retained for the greater of five (5) years or any alternate period specified below. Copies made by photocopying, scanning, or similar methods may be substituted for the original records.

Each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served.

If Continuum of Care funds are used for the acquisition, new construction, or rehabilitation of a project site, records will be retained until 15 years after the date that the project site is first occupied, or used, by program participants.

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

Notwithstanding the confidentiality procedures above, HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, have the right of access to all books, documents, papers, or other records of the recipient and its subrecipients that are pertinent to the Continuum of Care grant, in order to make audits, examinations, excerpts, and transcripts. These rights of access are not limited to the required retention period, but last as long as the records are retained.

Citizens, public agencies, and other interested parties will be provided with reasonable access to records regarding any uses of Continuum of Care funds that any recipient or sub-recipient received during the preceding 5 years, consistent with State and local laws regarding privacy and obligations of confidentiality and confidentiality requirements of Federal regulations governing the CoC.

CONTINUUM OF CARE FUNDING RECORDS – State or Local Funds:

Unless otherwise specified in an applicable grant agreement or contract for funding, records pertaining to funding from local sources or State Grants that are non-Federal dollars, will be retained for five (5) years. Documents will be stored electronically when feasible, and photo- or scanned copies are acceptable substitutes for originals.



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

CONTINUUM OF CARE FUNDING RECORDS – Other Funds:

Records not included in the scope of documentation specified above will be kept for three (3) years from the date of a project or fiscal year is closed, as applicable, unless otherwise stated. Documents will be stored electronically when feasible, and photo- or scanned copies are acceptable substitutes for originals.

PUBLIC ACCESS:

Citizens, public agencies, and other interested parties will be provided with reasonable access to records regarding any uses of Continuum of Care funds that any recipient or sub-recipient received consistent with the retention periods specified above; State and local laws regarding privacy; and obligations of confidentiality and confidentiality requirements of Federal regulations governing the CoC.