

RECORDKEEPING PROCESS

I. INTRODUCTION

All ACEDP grantees are required to develop a recordkeeping system that is comprehensive, well-organized and easy to review.

The recordkeeping system below provides a suggested filing system that grantees may follow to organize project documents. Grantees may choose to use their own filing systems, as long as these systems meet the above-specified requirements.

Many documents could be filed in several places throughout the filing system. For example, Equal Opportunity Direct Benefit Forms could be filed with fair housing/equal opportunity or closeout documents. In these cases, the form has been listed in each file, with an asterisk following the title of the form. This asterisk only signifies multiple filing options. It is not intended to require duplicate filing. Not all documents listed in this recordkeeping system will be applicable to your project.

All documents contained in this filing system must be available for four years after the date of project closeout.

II. RECORDKEEPING SECTIONS

A. Pre-application/Application (See the ACEDP Application Guidelines for specific components of pre-application, referral and application materials)

1. WWAC pre-application materials for water and sewer projects only
2. WWAC comment and approval letters for water and sewer projects only
3. Agency pre-application referral letters (e.g., public health, senior centers, childcare)
4. Pre-application review and comment letters from the Arkansas Economic Development Commission
5. Arkansas Economic Development Commission application invitation letter
6. Conditional commitment letter(s) (for economic development projects)
7. ACEDP application materials
8. Arkansas Economic Development Commission application comment letter(s)
9. Arkansas Economic Development Commission application approval letter
10. General correspondence (filed chronologically)

- B. Procurement** (Establish a separate file for each item or service procured)
1. Small purchase procurements
 - a. Written description of items/services to be procured
 - b. List of vendors/bidders contacted, as required
 - c. Documentation of contact to the Arkansas Economic Development Commission Small and Minority Business Division
 - d. Copies of all bids received or list of bids with lowest bidder identified
 - e. Notification letters to each bidder
 - f. Executed contract or written engagement letter with amendments
 - g. General correspondence (filed chronologically)
 2. Designation of Public Agency as Grant Administrator
 - a. Grantee resolution designating public agency as ACEDP grant administrator
 - b. Letter to the Arkansas Economic Development Commission designating public agency
 - c. Executed ACEDP contract for administrative services with amendments, if applicable
 - d. General correspondence (filed chronologically)
 3. Competitive Sealed Bids
 - a. Bid package and addenda*
 - b. Contract document approval letters and/or authorization to advertise for bids*
 - c. Documentation of contact to the Arkansas Economic Development Commission Small and Minority Business Division
 - d. Proof of publication for bid advertisement*
 - e. Copies of solicitation letters sent directly to potential bidders
 - f. Bid tabulation sheet (Form 63)
 - g. Verification of Contractor Eligibility Form(s) (Form 64)
 - h. Notice of Award with notification to unsuccessful bidders (Form 65)
 - i. Executed contract with amendments*
 - j. General correspondence (filed chronologically)
 4. Competitive Negotiation (Professional Services)
 - a. Request for Qualifications (RFQ) package (Forms 9-14)
 - b. Documentation of contact to the Arkansas Economic Development Commission Small and Minority Business Division
 - c. Proof of publication for request for qualifications
 - d. Copies of solicitation letters sent directly to potential bidders
 - e. Statements of qualifications from firms responding to the RFQ
 - f. Selection committee criteria
 - g. Selection committee score sheets evaluating respondents
 - h. Notice of Award and letters to unsuccessful respondents
 - i. Executed contract for professional services with amendments, if applicable

General correspondence (filed chronologically)

5. Non-Competitive (Sole Source) Procurement
 - a. Letter to the Arkansas Economic Development Commission requesting sole source procurement
 - b. Bid package/description of items or services to be sole source procured
 - c. Letter from the Arkansas Economic Development Commission approving the sole source procurement
 - d. Executed contract or award letter with amendments*
 - e. General correspondence (filed chronologically)

C. Environmental Review

1. Designation of environmental review compliance liaison
2. If exempt: Finding of exemption determination
 - a. Finding of exemption determination (Form 21)
 - b. Letter from the Arkansas Economic Development Commission approving the exempt determination
 - c. Environmental Review Checklist (Form 32)
 - d. General correspondence (filed chronologically)
3. If an environmental assessment is prepared
 - a. Notification letter to the Arkansas Department of Parks and Tourism
 - b. Copy of floodplain map or other documentation establishing floodplain elevations
 - c. Completed Statutory Checklist (Form 24)
 - d. Correspondence to and from applicable review agencies as listed on the Statutory Checklist
 - e. Copies of applicable permits
 - f. Copies of test results (e.g., lead-based paint and asbestos)
 - g. Environmental assessments or cultural resource studies
 - h. Notice of Intent to Request Release of Funds (NOI/RROF) proof of publication
 - i. Request for Release of Funds and Certification
 - j. Completed Environmental Assessment Checklist (Form 32)
 - k. Correspondence to and from applicable review agencies as listed on the Environmental Assessment Checklist
 - l. Finding of No Significant Impact (FONSI) proof of publication or Combined NOI/RROF/FONSI Notice proof of publication (Forms 29-30)
 - m. List of persons receiving FONSI (Form 31)
4. If the project is located in a floodplain
 - a. Public notice for early public review
 - b. Notice of explanation of project located in a floodplain (Form 19)

- c. Information describing floodplain mitigation activities
- d. General correspondence (filed chronologically)
- 5. If an environmental impact statement is required, an Environmental Impact Statement (EIS) document
- 6. Arkansas Economic Development Commission Environmental Review Clearance Letter (Form 27)

D. Labor Standards

- 1. SF-308 Request for Determination and Response to Request* (Form 90)
- 2. Wage Determination(s) including modified or superseded wage decisions
- 3. Report of additional classification(s) and rate(s) with supporting documentation (Form 91)
- 4. Additional U.S. D.O.L. wage classifications transmitted by the Arkansas Economic Development Commission
- 5. Support documentation and correspondence specific to additional classifications
- 6. Verification of Contractor Eligibility Form(s)*
- 7. Weekly payrolls with Statements of Compliance from all contractors and subcontractors. (A separate file for each contractor and subcontractor must be established.)
- 8. Records of employee interviews for ACEDP Project (Form 94)
- 9. Semi-Annual Labor Compliance Reports (Form 95)
- 10. Labor Standard Enforcement Reports (Form 96)
- 11. Force account request and Arkansas Economic Development Commission approval letter
- 12. Weekly payrolls for force account labor
- 13. General correspondence (filed chronologically)

E. Financial Management and Grant Agreements

- 1. Grant agreement with amendments
- 2. Documentation removing special conditions of the grant
- 3. Request to Incur Cost Letter (Form 1)
- 4. Authorization to Incur Cost Letter
- 5. Bank Designation and Check Signature Form (Form 2)
- 6. Request for Payment Signature Card (Form 3)
- 7. Arkansas Direct Deposit System General Expense Direct Deposit Authorization Form (Form 4)
- 8. Bank register and printed checks
- 9. Requests for Payment
- 10. Source Documentation (invoices, bills, pay estimates, vouchers, and purchase orders)
- 11. Monthly bank statements and canceled checks and deposit slips*
- 12. General ledger, journals and chart of accounts
- 13. Balance sheets and other financial reports*

14. Property card or inventory record of equipment purchased with ACEDP funds (Form 6)
15. General correspondence (filed chronologically)

F. Audit (Separate files must be established for each audited year)

1. Annual Audit Plan (Form 105)
2. Procurement information for auditor (Form 102)
3. Audit contract (Form 107)
4. Audit report(s)
5. Supplemental Audit information addressing findings and concerns
6. Arkansas Economic Development Commission audit approval letter(s)
7. Corrective action plan*
8. General correspondence (filed chronologically)

G. Fair Housing/Equal Opportunity

1. Fair Housing/Equal Opportunity Certifying Officer Notification Letter (Form 55)
2. Section 3 Contractor Compliance Forms and New Hire Reports (Form 59)
3. Equal Employment Opportunity Poster (posted on site) (Form 53)
4. Equal Housing Opportunity Poster (posted at City Hall or the County Courthouse) (Form 54)
5. EO Direct Benefit Form (Form 58)
6. Documentation of Activity to Affirmatively Further Fair Housing (Form 60)
7. Contract and Subcontract Activity Form(s) (Form 57)
8. ACEDP EDSA Income Certification Form (Economic Development) (Demographic Data) (Form 98)
9. ACEDP Job Activity Logs (Economic Development) (Demographic Data) (Form 99)
10. Public participation data documenting particular efforts to solicit and notify disadvantaged citizens of the project
11. Personnel policies*
12. Affirmative Action Plans*

H. Acquisition

1. General Acquisition Documents
 - a. Sample Residential Anti-displacement and Relocation Assistance Plan (Form 35)
 - b. Plat or location map identifying all parcels to be acquired
 - c. Site Acquisition Report or property control register listing all property (fee simple titles and easements) to be acquired
 - d. Acquisition Complete Letter (Forms 45-46)
 - e. General correspondence (filed chronologically)
2. Project Specific Files (Documentation applicable to each individually acquired property, fee simple titles and easements)

- a. Title evidence indicating property ownership (abstractor information, deeds, etc.)
- b. Notice of Intent to Acquire and Rights under the Uniform Relocation Act for Fee Simple Purchases **OR** Notice of Intent to Acquire and Rights under the Uniform Relocation Act for Easements (Form 36-37)
- c. Acquisition of Easements and Fee Simple Titles under the Uniform Relocation Act and the Rights of the Property Owner (Form 38)
- d. Return-receipt “green cards” or Receipt-of-Information Forms indicating that the property owner has received notification of URA rights

If property is donated, the following additional items to H.2.a.-d. are required:

- 1) Waiver of Rights and Benefits of the Uniform Relocation and Real Property Acquisition Policies Act of 1970, as amended (Form 40)
- 2) Signed easement or fee simple warranty deed, as filed by the court (Form 41)

If property is purchased, the following additional items to H.2.a.-d. are required:

- 1) Documentation establishing fair market value (FMV)
 - a) If appraisal FMV exceeds \$2,500):
 - (1) Notice of Appraisal and Right to Accompany Appraiser
 - (2) Documentation responding to above letter
 - (3) Appraisal Report (Form 50)
 - (4) Review Appraisal Report (required whenever an appraisal is performed) (Form 51)
 - b) If an appraisal is not performed: the methodology establishing the calculation of fair market value
- 2) Statement of the Basis of Just Compensation (Form 43)
- 3) Written Offer of Just Compensation
- 4) Evidence of Negotiation
- 5) Acceptance of Offer
- 6) Copy of check issued to seller
- 7) Statement of Settlement Cost (Form 44)
- 8) Survey (Fee Simple purchases only)
- 9) Copy of signed easement or warranty deed with filing data attached (Form 41)

If property is condemned, the following additional items to H.2.a.-d. and items 1)-4) and 8) and 9) under “If property is purchased” are required:

- 1) Written termination of negotiation
- 2) Condemnation suit filing documents

- 3) Copy of court determination and right of entry
- 4) Appellate court review documentation (if applicable)
- 5) Escrow account with account disbursements listed and canceled
- 6) Copy of filed easement or warranty deed (Form 41)

A Notice of Intent Not to Acquire Property must be sent to property owners who were originally informed that their property was being acquired but subsequent design revealed no need for the property. (Form 48)

3. Relocation (The documentation is applicable to each individual or business relocated as a result of the project.)
 - a. Notice of Displacement
 - b. Notice to Vacate
 - c. Income Verification
 - d. Relocation efforts
 - e. Household case record and survey guide
 - f. 180-day verification
 - g. Seller's Statement
 - h. Real Estate Settlement Record
 - i. Bill of Sale
 - j. Contracts
 - 1) Redevelopment Contract
 - 2) Rental Contract
 - 3) New Construction Contract
 - k. Comparable housing
 - l. Proposal
 - m. Comparable Replacement Statement
 - n. Inspection (temporary move)
 - o. Moving and storage receipts
 - p. Partial payment (if requested)
 - q. Release of Lien Form
 - r. Lumber Company Waiver
 - s. Subcontractor's Waiver
 - t. Inspection of permanent replacement property
 - u. Claim for moving expenses
 - v. Claim for owner replacement housing payment
 - w. Claim for rental assistance payment
 - x. Claim for down payment assistance
 - y. Receipt for final payment

I. Construction Management

1. Contract Documents
 - a. Plans and Specifications
 - b. Construction bid advertisement proof of publication
 - c. Drawings
 - d. Sample Bid Package for ACEDP-funded projects

- e. Addenda with the Arkansas Economic Development Commission approval letters
2. Plans and specifications review and approval letters
3. Required permits issued by applicable review agencies
4. Bid receipt form
5. Bid Tabulation Sheet
6. Notice of Award
7. Verification of Contractor Eligibility Form(s)
8. Pre-construction Conference Agenda and Report
9. Notice to Proceed
10. Contractor pay estimates*
11. Resident observation daily and weekly reports
12. Change orders with agency approval letters
13. Shop drawings, warranties, manuals, etc.
14. Liquidated damages documentation
15. Punch List(s)
16. Release of Liens Form(s)
17. Certificate of Substantial Completion
18. Documentation establishing a twelve-month warranty period

J. Low and Moderate Income Utility Hookups (A separate file must be established for each applicant applying for a free hookup. See Item 3 below.)

1. "Notice to Area Residents of Free Utility Connections ("proof of publication", flyers, letters, etc.)
2. Section 8 Income Limits
3. Applicant specific records
 - a. Application for Free Utility Connection
 - b. Income Verification Information
 - 1) Employee wages
 - 2) Social Security Benefits
 - 3) Arkansas Social Services
 - 4) 1040 Income Tax Forms
 - c. Verification of Home Ownership
 - d. Notice of Eligibility Determination (approval/disapproval)
 - e. Work write-up (may all be filed together)
 - f. Temporary construction easement and hookup agreement
 - g. Rental Agreement
4. Sample Bid Package for General Contractor (Form 119)
5. Notice to Proceed (Form 67)
6. Release-of-Lien Form (Form 73)
7. Contractor Warranty
8. Certificate of Substantial Completion (Form 72)
9. Plumbing Inspector Clearance Letter (Form 87)
10. Verification of Contractor Eligibility Form (Form 64)
11. Punch List (Form 71)
12. Preconstruction Conference Agenda and Report (Form 66)

13. General correspondence (filed chronologically)

K. Closeout

1. Closeout Certification (Form 109)
2. Equal Opportunity Direct Benefit Form (Form 58)
3. Final Job Creation Report (Form 101)
4. Procurement Information for Final Audit
5. Final Request for Payment
6. Zero Report
7. Final Labor Standards Enforcement Report (Form 96)
8. Final Audit
9. Final Grant Amendment
10. Arkansas Economic Development Commission Closeout Letter
11. Condemnation Escrow Account Closure (normally N/A)*
12. Davis-Bacon Liquidated Damages Account Closure (normally N/A)*
13. General correspondence (filed chronologically)

L. Monitoring

1. Monitoring reports and cover letters
2. Responses to monitoring report
3. Arkansas Economic Development Commission disposition letters to monitoring responses
4. General correspondence (filed chronologically)

M. Economic Development

1. Job Creation Plans
2. ACEDP Income Certification Form
3. ACEDP Job Activity Logs
4. Loan documents
5. General correspondence (filed chronologically)

* If applicable