RECORDKEEPING & COMPLIANCE

Quick Reference Guide

Overview

This guide helps ESG and CoC providers understand, maintain, and monitor the necessary **documentation and systems to ensure compliance** with HUD regulations, CoC Program, and ESG Program requirements, and Rural Nevada CoC Policies.

CORE RECORDKEEPING REQUIREMENTS

Client Eligibility Documentation

Providers must document eligibility at intake:

- **Homeless Status**
    - Acceptable documentation hierarchy:
        1. Third-party documentation (e.g., shelter records, HMIS)
        2. Intake worker's observation
        3. Client self-certification (only when other options are not available)
- **Income Verification**
    - Required for ESG Homeless Prevention and CoC programs
    - Income documentation: pay stubs, benefits letters, bank statements
    - Income must be updated and verified at least annually
- **Disability Status**
    - Required for Permanent Supportive Housing (PSH) clients
    - Must be verified by a licensed professional or through SSI/SSDI documentation

Housing Documentation

- For Rapid Re-Housing (RRH) and Homelessness Prevention:
    - **Lease Agreements**: Signed by landlord and tenant
    - **Rent Reasonableness**: Documented through comparison of at least three units
    - **Habitability Standards Inspection**: Performed prior to move-in
    - **Lead-Based Paint Disclosure**: For units built before 1978

Service Documentation

- **Case Notes**: Should be clear, consistent, and dated
- **Housing Plans**: Individualized and updated regularly
- **Referrals and Follow-ups**: Documented in client file of HMIS
- **Supportive Services**: Proof of services provided or referred

Financial Records

- **Invoices & Receipts**: For all program expenditures
- **Proof of Payment**: Canceled checks, bank statements, etc.
- **Timesheets**: For staff funded partially or fully by the program
- **Budget to Actual Reports**: Maintain updated and accessible copies

HMIS Compliance

- **Data Entry Timeliness**: Within 24 hours of contact
- **Data Quality**: Regular audits to ensure accuracy, completeness, and timeliness
- **Client Consent**: Signed release of information for HMIS participation

Compliance Monitoring Best Practices

- **Conduct Quarterly File Reviews**
  Use internal checklists to audit files for completeness and accuracy
- **Train Staff Regularly**
  Ensure staff understand documentation requirements and CoC/ESG updates.
- **Maintain Organized Files**
  Paper or electronic- must be easy to navigate and accessible for monitoring.
- **Retention Period**
  Maintain all records for at least 5 years from grant close-out or client exit.
- **Corrective Action Plans**
  Implement if deficiencies are found during internal or external reviews.

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Need Help?

For further details, refer to the **ESG & RNCoC Written Standards** @ https://ruralnevadacoc.org/resources-page/ or contact your program administrator.