**Procedure for HCV Client Files**

**Basic record procedure**

1. Records of current participants shall be retained as long as they are in the program, although only the original application, all data about the current assisted unit regardless of its age and the most recent three years of other activity will be kept in the active file. All other older information may be archived.
2. Records of past/terminated participants with no balance owed to PHA shall be retained for three years and then shredded.
3. Records of past/terminated participants with a balance owed to PHA shall be maintained indefinitely until the balance is cleared, whether or not the balance has been written off.
4. Voucher Program records in litigation shall be retained indefinitely, regardless of participation status.
5. Records shall be disposed of in accordance with PHA’s records disposal policy.

**Assignment**

PHA staff members shall be assigned a caseload for which he/she shall be responsible, including maintenance and securing of the client files and the information therein.

**Maintaining Client Records**

1. Client records (files) shall be maintained in alphabetical order by last name of client. Each PHA staff is responsible for tracking the location of each assigned client file, maintaining the documents therein, and securing all files assigned. Maintenance of the assigned files shall be in accordance to PHA’s retention policy in the Administrative Plan for Housing Voucher Programs and in the Record Retention Policy. Each file shall be organized according to the file stacking process.
2. Each PHA staff and other staff members with access to client files must maintain transmittal sheets to log and track files/records in and out of their possession or assigned areas.

 **Security of Client Records**

1. To protect sensitive information in the Client files, Client records therein must be maintained in a secured location (such as in a file locked cabinet) at all times, under lock and key. Key access should be granted only to the assigned PHA staff.
2. All employees issued keys to secure file cabinets/file rooms containing client files and EIV reports will complete a form acknowledging receipt of such key(s). A log will be kept showing, at a minimal, the name and date that the key was issued/replaced and the date that the key was returned. The log should also list the name(s) of persons with a copy of the key other than the assigned PHA staff.
3. Files should remain in the Voucher Programs building at all times except when used at another PHA office location (e.g. for informal hearings and audits and review in response to court subpoenas, etc.). All client records must be maintained confidentially at all times and shall not be used other than the purposes intended or misused or improperly disseminated. Unauthorized PHA staff must not have access to client files, workstations, computers, or file cabinets that contain client records.
4. Files must not be placed on counters, tables, or desktops, and computer screens containing client records, must not be left open with sensitive data, unattended. Files will be locked in desk or file cabinets and computer screens must be cleared or locked before staff leaves his/her desk for any reason. The assigned staff must ensure that client files are locked in cabinets or file room at the close of each business day. Any combination locks used for security purposes will be reset quarterly or as needed due to staff turnover.
5. All requests by third parties to review or for copies of Client files/records shall be directed/forwarded to PHA’s Legal Department. No copy of Client files/records and no Client information shall be released to third parties, except through the Legal Department.

 **Caseload Reorganization and/or Reassignment**

1. Caseload reorganization and/or reassignment due to the separation from PHA of PHA staff will require that the files/records to be properly re-distributed by physically shifting the file/records to the newly assigned PHA staff(s), along with proper tracking to the new secured location.
2. For caseloads that will not be reassigned upon separation of PHA staff, the files must remain secured in the assigned area until the vacant PHA staff position is filled. Once a new PHA staff is assigned, all files must be tracked and logged.

 **Organization of Client Records in Client File**

1. All files must be organized according to the most updated approved PHA file stacking sheets **(see Attachment)**.
2. The file stacking protocol requires the use of 6-flap files.

# PERSONAL INFORMATION/ELIGIBILITY INFORMATION

**Front Left Flap (1 of 6)**

* File Narrative/Historical Log/Visual Home Notes **(Top)**
* Criminal Background Check Forms for all Family Members 18 and Over/Criminal Background Check Waiver Forms (The form contains the important information from the criminal history check which will always be shredded)
* Valid Driver’s License/Government Issued Photo ID or Military ID for Head of Household
* Social Security cards for all Family Members (Legible and only one card for each Family Member)
* Birth Certificates, baptismal certificates or passports for each Family Members
* Remove or Add Family member documentation
* Guardianship/Custody Documents OR documents from school system OR doctors demonstration of kinship care (if applicable)
* Live-In Aide Documents (if applicable)
* HUD 214 Declaration of U.S. Citizenship or Non-citizen with Eligible Immigration Status or Non-Disclosure Form for each Family Member
* HUD form-Debts Owed to Public Housing Agencies and Terminations
* Family Obligations
* Other identification records
* Other Eligibility Information (if applicable)
* Full Applications or Portability Documents
* Waitlist Notification Letter
* Original Pre-Application (including DVP Info, if applicable)
* Acknowledgement of Missing Documents Form (if applicable) **(Bottom)**

**FILE INSTRUCTIONS: Information should be stacked in chronological order, with the newest (most current) paperwork on top. This pink sheet should separate each year.**

SIGNATURES:

Occupancy Technician Date

Records Staff Date

Supervisor Date

Quality Control Occupancy Technician Date

**FAMILY CORRESPONDENCE**

**Flap 2 of 6**

* Appointment letters (recertification, interims, other)
* Notice of Potential Impact with Calculation Worksheet (ZBP)
* Continuation of Assistance letters/declaration (Client is requesting more time to stay in current unit while searching for a new unit.)
* Final Notice letters (Request for Additional Information)
* Declaration (Statement of Facts/Written Notice from Client)
* Portability Notice
* Notification of Interim Changes (Request from Client)
* Request to Move Notice
* Letter of Good Standing to move from current landlord
* Hearing Notice/Hearing Results
* Termination of Assistance Notices
* Eviction Notice
* Other Family Correspondence

**FILE INSTRUCTIONS: Information should be stacked in chronological order, with the newest (most current) paperwork on top. This pink sheet should separate each year/transaction.**

SIGNATURES:

Occupancy Technician Date

Records Staff Date

Supervisor Date

Quality Control Occupancy Technician Date

**QUALITY CONTROL/ SCREENING FORMS/AGREEMENTS/OTHER**

**Flap 3 of 6**

* QC forms (TOP)
* Screening Form
* Compliance Screening/Audit forms
* Repayment Agreement
* Earned Income Disallowance (EID) Tracking Form
* Reasonable Accommodation Requests
* Reasonable Accommodation Determinations (BOTTOM)

**FILE INSTRUCTIONS: Information should be stacked in chronological order, with the newest (most current) paperwork on top. This pink sheet should separate each year/transaction.**

SIGNATURES:

Occupancy Technician Date

Records Staff Date

Supervisor Date

Quality Control Occupancy Technician Date

**INSPECTIONS AND RENT REASONABLENESS**

**Flap 4 of 6**

* Annual Inspections (TOP)
* Complaint Inspections
Initial Inspection
* Rent Reasonableness Documentation (for the approved Rental Increase)
* Rent Increase Approvals
* Rent Increase Requests
* DNL packets (DNL-DO NOT LEASE/CANCELED RFTA PACKET) (BOTTOM)

**FILE INSTRUCTIONS: Information should be stacked in chronological order, with the newest (most current) paperwork on top. This pink sheet should separate each year/transaction.**

SIGNATURES:

Occupancy Technician Date

Records Staff Date

Supervisor Date

Quality Control Occupancy Technician Date

**HOUSING ASSISTANCE PAYMENT (HAP) CONTRACTS/VOUCHER**

**Flap 5 of 6**

* Housing Voucher (change in voucher size-not relocation) (TOP)
* Notice of Change/Amendment to HAP Contract (Rent Change Notice/Completed Rx or Interim letter)
* Housing Assistance Payment Contract (parts A-C)
* Assisted Lease Agreement
* Tenancy Addendum
* Rent Calculation worksheet (Used to write contract)
* Utility Allowance Schedule (Used to write contract)
* Housing Voucher
* Request for Tenancy Approval (leave Lead-Based Paint Form Attached)
* Rent Reasonableness Documentation for initial HAP Contract
* 30 day notice to vacate
* 40% sheet completed at voucher issuance/Affordability Worksheet (ZBP)
* Lead-Based Paint Form (pamphlet)

**FILE INSTRUCTIONS: Information should be stacked in chronological order, with the newest (most current) unit information on top. This pink sheet should separate each year/unit.**

SIGNATURES:

Occupancy Technician Date

Records Staff Date

Supervisor Date

Quality Control Occupancy Technician Date

**RECERTIFICATION (ANNUAL/INTERIMS/OTHER**

**50058 TRANSACTIONS AND COMPLETE PACKET**

**Flap 6 of 6**

* File Checklist for each action (TOP)
* Family Report 50058
* Finance Adjustment Worksheet (if applicable)
* Worksheets (calculations and adjustments)
* Utility Worksheet
* Income Verification (in order of verification hierarchy)
	+ EIV and EIV Worksheet
	+ Third Party Tracking Form (must be attached to ALL verifications, individually stapled)
	+ Third Party or other verification forms
* TANF/Food Stamp Verification (with Tracking Form Attached)
* Zero Income checklist, as applicable
* All Medical Bills, as applicable (Detailed Medical Information MUST BE EXTRACTED)
* Childcare Verification, as applicable (with Tracking Form Attached)
* Disability Assistance Verification (with Tracking Form Attached)
* Full-time Student Verification (with Tracking Form Attached)
* Asset/Bank Statements and Verification (with Tracking Form Attached)
* Certification of Asset Disposal
* Authorization Forms (9886 and others)
* Recertification Packet (PDQ including the Tenant Certification)
* Previous documents related to Historical Reexaminations (BOTTOM)

Type of Action: Admission Annual Interim

 Rental Increase Move Port

**FILE INSTRUCTIONS: Information should be stacked in chronological order, with the newest (most current) paperwork on top. This pink sheet should separate each year/transaction.**

SIGNATURES:

Occupancy Technician Date

Records Staff Date

Supervisor Date

Quality Control Occupancy Technician Date