Procedure for Public Housing and Project-based Voucher Tenant Files

**General Procedure**

1. Active Tenant records (for families/individuals who are still PH Tenants) shall contain the original application package and the last three years’ worth of activity, plus the most recent Lease if older than three years. Most other materials of active Tenants older than three years may be archived.
2. Work orders involving charges for maintenance due to tenant neglect or damages will be retained for 5 years in the file.
3. PHA records shall be maintained in accordance with PHA’s Record Management Policy.
4. Records of past (vacated) Tenants who left with no balance owed to PHA and no outstanding lease termination proceedings shall be retained for three years and then shredded.
5. Records of past Tenants with a balance owed to PHA and/or outstanding lease termination proceedings shall be maintained indefinitely until the balance is cleared, whether or not the balance has been written off. The entire file does not need to be retained. What should be kept is a record in sufficient detail to explain thoroughly any balance owed or the reason for any lease termination in progress when the Tenant vacated.
6. Public Housing Program records involving litigation shall be retained indefinitely, regardless of participation status.
7. Records shall be disposed in accordance with PHA’s records disposal policy.

**Assignment**

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

 **Maintaining Tenant Records**

1. Tenant records (files) should be maintained in alphabetical order by last name of tenant. Each staff person is responsible for tracking the location of each assigned Tenant 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 Record Management Policy. Each file shall be organized according to the file stacking process.
2. Staff members with access to Tenant files must maintain transmittal sheets to log and track files/records in and out of their possession or assigned areas.

**Security of Tenant Records**

1. To protect sensitive information in the Tenant files, Tenant 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 authorized staff.
2. All employees issued keys to secure file cabinets/file rooms containing Tenant files and EIV reports will complete a form acknowledging receipt of such key(s). A log will be kept showing, at a minimum, 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.
3. Files should remain in the PHA office 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 Tenant 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 Tenant files, workstations, computers, or file cabinets that contain Tenant records.
4. Files must not be placed on counters, tables, or desktops, and computer screens containing Tenant 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 Tenant 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 Tenant files/records shall be directed/forwarded to PHA’s Executive Director. No copy of Tenant files/records and no Tenant information shall be otherwise released to third parties.

**Caseload Reorganization and/or Reassignment**

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

**Organization of Tenant Records in Tenant File**

All files must be organized according to the most updated approved PHA file stacking sheets.

# PERSONAL & 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
* Tenant history records (previous landlords)
* Utility History records
* Other Eligibility Information (if applicable)
* Full Applications or Portability Documents
* Waitlist Notification Letter
* Original Pre-Application
* 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 (briefing, admission, recertification, interims, other)
* Offer of Housing
* Good Cause for Refusal determination letter
* Continuation of Assistance letters/declaration
* Final Notice letters (Request for Additional Information)
* Declaration (Statement of Facts/Written Notice from Client)
* Notification of Interim Changes (Request from Client)
* Grievance Procedure request
* Hearing Notice/Hearing Results
* Lease termination 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**

**Flap 4 of 6**

* Annual Housekeeping Inspections (TOP)
* Photos of housekeeping fail conditions
* Letters on Housekeeping fail cure
* Housekeeping re-inspections
* Pre-REAC inspections
* REAC inspection results
* Exterminator’s notes
* Maintenance notes
* Other inspections with explanations (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

**LEASE, HOUSE RULES AND LEASE ENFORCEMENT**

**Flap 5 of 6**

* Current executed Lease
* Current House Rules
* Notice of Rent Adjustment
* Community Service verifications/exemptions
* Lease Violation Letters
* Rent Calculation worksheet (Used to write contract)
* Utility Allowance Schedule (Used to write contract)
* Lead-Based Paint Form
* Lease Termination Letter
* Notice to Vacate
* 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 (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 or certification (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