

## **Case File Requirements**

The IDA Program requires that individual case files be maintained for each program participant. Files must comprise all information collected on the participant including, at minimum, documentation of participant eligibility, Savings Plan Agreement, household budget, documentation of trainings completed by the participants, proof of purchase of the asset, and case notes.

Programs must ensure compliance with 45 CFR § 75.303(e) to take reasonable measures to safeguard protected personally identifiable information. Files must also include documentation of all financial assistance payments made to, or on behalf of, the participant, along with any applicable invoices and receipts. Case files must be available to ORR monitors, or other responsible Federal staff, upon request. When not in use, both physical and electronic case files must be properly secured as to ensure only appropriate staff have access. If the IDA Program is using an electronic case file system, then safeguards such as limiting access to the data and encryption must be in place to protect participant information. Paper files must be kept confidential - ideally in a file cabinet that is kept locked and can be accessed only by authorized staff.