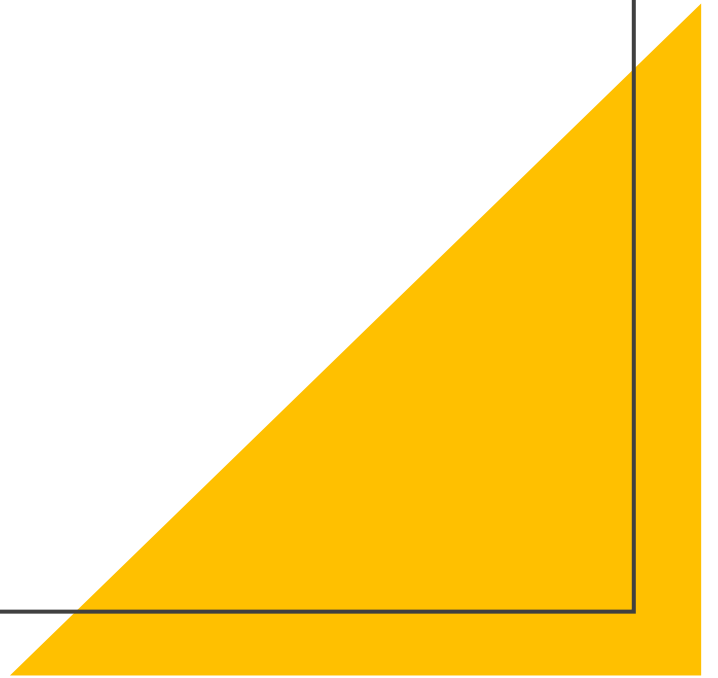


ONAP

Monitoring

It's not as scary as you think.



Introduction

Why we monitor

How we do it

What happens next

Authorities

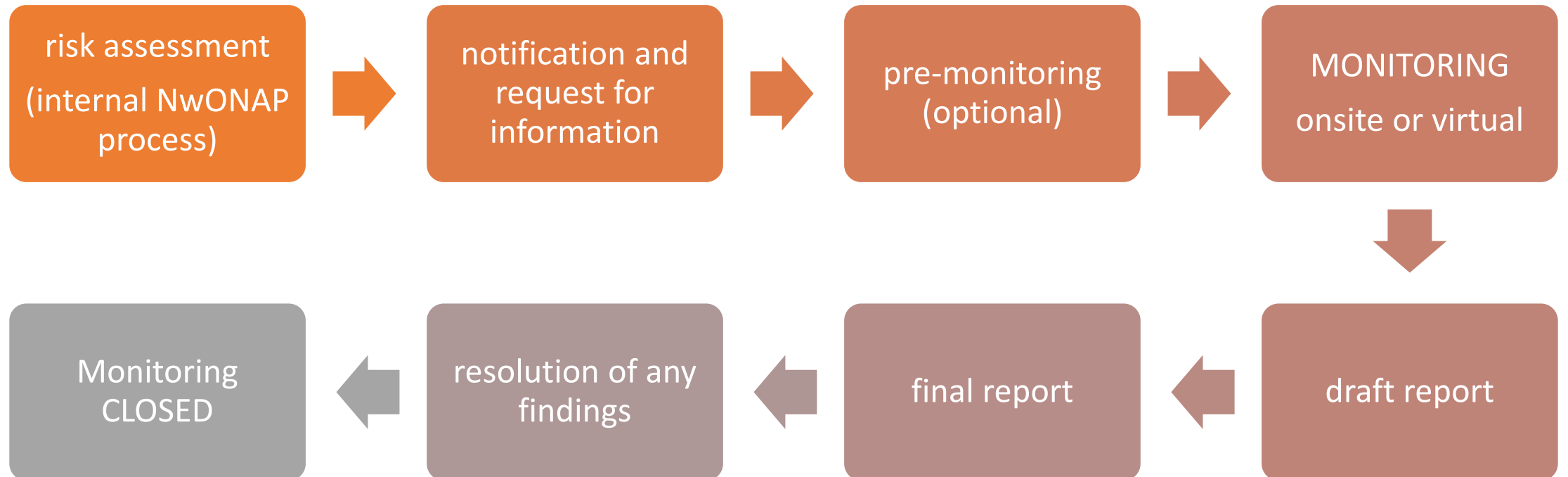
Statutory

- NAHASDA
- Title IV – Compliance, Audits, and Reports
- Sec. 405 – Review and Audit by Secretary

Regulatory

- 24 CFR Part 1000
- Subpart F – Recipient Monitoring, Oversight, and Accountability

ONAP Monitoring Process



Request for Information

2. List of the TDHE employees, identifying their positions and phone numbers.	<input type="checkbox"/>
3. List of the TDHE Board Members.	<input type="checkbox"/>
4. Copies of meeting minutes for Board since October 1, 2029.	<input type="checkbox"/>
5. Copy of the Board's bylaws.	<input type="checkbox"/>
6. Copies of resolutions related to HUD funding.	<input type="checkbox"/>
7. Copies of reports for the IHBG, ICDBG, and ROSS grants provided to the Housing Board or Tribal Council.	<input type="checkbox"/>
8. Copies of Local Cooperation Agreements with the local governments.	<input type="checkbox"/>
9. Other (Identify):	<input type="checkbox"/>
Financial Information	
Please Provide October 1 2019, through February 28, 2020, <u>in advance</u> . March 1, 2020 through April 18, 2022, will be requested onsite.	
10. Chart of Accounts applicable to HUD funded programs.	<input type="checkbox"/>
11. Electronic copies of the G/L Trial Balances (by grant, by year) for expenditures during the review period.	<input type="checkbox"/>
12. General Ledger detail report (Excel preferred) of expenditures (by grant, by year) for expenditures incurred during the review period.	
13. Copies of any self-monitoring reviews or internal audits of NAHASDA programs.	<input type="checkbox"/>
14. A reconciliation of the expenditures reported in the most recent FY 2021 APR to the financial records.	<input type="checkbox"/>
15. Copies of any sub-recipient agreements.	<input type="checkbox"/>
16. Copy of the most recent invoice and proof of payment for insurance coverage of housing units, autos, and other insurance related to the housing assets. A policy review may be performed on site.	<input type="checkbox"/>
17. Copy of the list of properties covered by the insurance company.	<input type="checkbox"/>
18. Financial reports detailing program income for the review period.	<input type="checkbox"/>
19. Financial reports to support the two most recent LOCCS draws for all grants.	<input type="checkbox"/>
20. Budget to Actual reports for IHBG, ICDBG, and ROSS for the review period.	<input type="checkbox"/>
21. Copy of the Indirect Cost Rate Proposals and/or Cost Allocation Plans for the review period.	<input type="checkbox"/>
22. If applicable, copies of the Depository Agreements for the IHBG investments.	<input type="checkbox"/>
23. Percentage of IHBG funds used for administrative and planning expenses and the calculation used to determine the amount	<input type="checkbox"/>

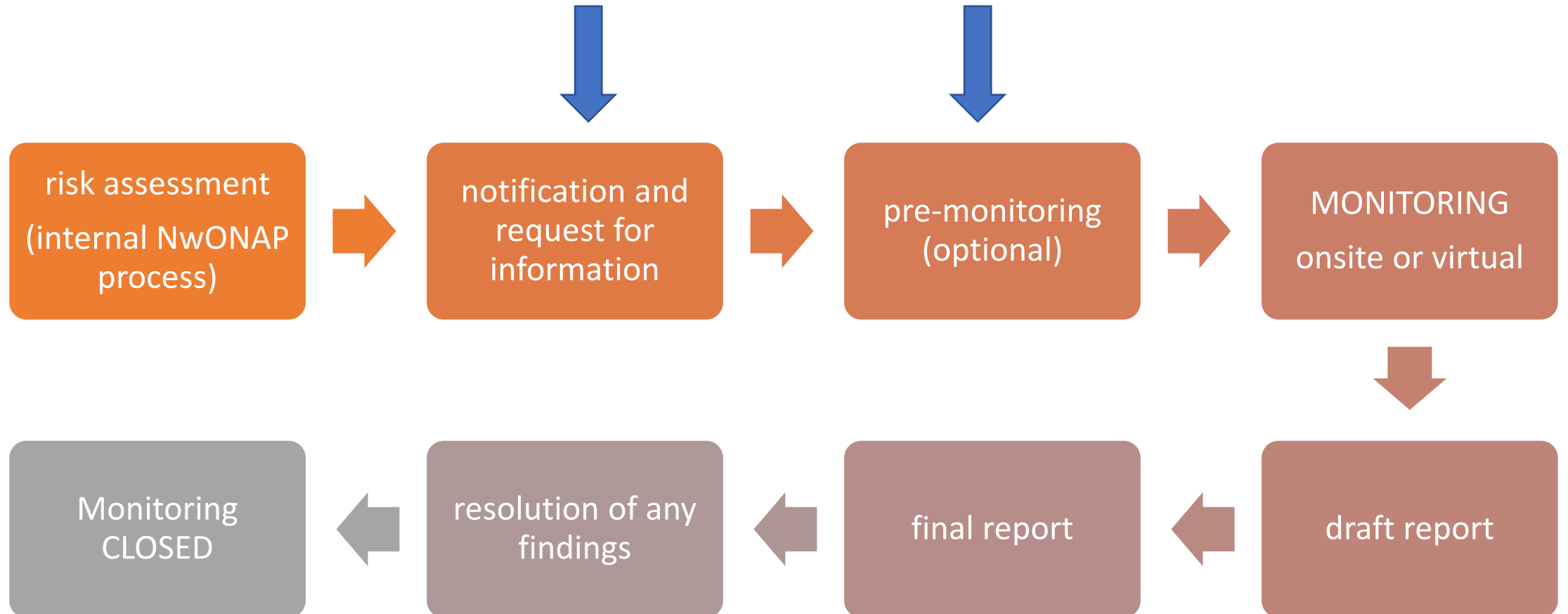
Request for Information

Maintenance and Inspections	
25. A list of Housing Authority managed properties for both NAHASHA and 1937 Act units, <u>including vacant units</u> . The list should include: Project number, program type (homeownership, rental, etc.), occupant name, and unit address. An electronic copy of this document is preferred (Excel). A sample of these units will be selected for onsite inspections and will be provided in advance of our onsite review.	<input type="checkbox"/>
Housing Programs Information	
26. Complete listing by address and by program of families currently assisted during the review period with NAHASDA-funded housing programs. The listing should include the date that assistance started. The listing should include managed properties (as requested under "Maintenance and Inspections" above). Please provide a listing of all NAHASDA funded housing programs operated during the review period, i.e.	<input type="checkbox"/>
27. Calculation form used for computing eligibility of participants and amount of assistance for NAHASDA-funded housing programs.	<input type="checkbox"/>
28. Waiting list(s) maintained during the review period for any program assisted with NAHASDA funds.	<input type="checkbox"/>
29. An aging schedule, by unit, for tenant accounts receivable during the review period.	<input type="checkbox"/>
30. Other (Identify):	<input type="checkbox"/>
Policies and Procedures	
31. Please provide the most current version of any policies and procedures that the Housing Authority uses for administering the IHBG, and any other HUD-funded programs. The following is a list of areas that should be covered by standard IHBG-related policies and/or procedures: <ul style="list-style-type: none"> • Personnel • Rents and homebuyer payment • Eligibility, admission, and occupancy • Management and maintenance • Stipends • Tenant and homebuyer selection • Self-Monitoring • Travel • Procurement • Indian preference in employment and training • Real property acquisition and relocation • Drug free workplace • Financial and accounting (including cash management) • Investment and internal control • Conflict of Interest in both procurement and personnel • Any other policies or procedures related to the administration of HUD-funded programs. 	<input type="checkbox"/>

Areas that *could* be monitored

- Organization Structure
- Financial Systems
- Internal Controls
- Self-Monitoring
- Compliance with IHP
- Procurement
- Maintenance
- Admissions & Occupancy
- Indian Preference
- Labor Standards
- Environmental Review
- Sub-recipients
- Lead-Based paint
- Relocation
- Useful life
- ALL HUD Grants (ROSS, ICDBG, ARP, CARES, Imminent Threat)

ONAP Monitoring Process



Prepare

- **Who are the Key Players on Your Team?**
 - Housing Director
 - Finance Officer, Accounting Staff
 - Maintenance Director
 - Occupancy Director
- **Where do Files and Documentation Live?**
- ***OPTIONAL:* Request pre-monitoring visit from ONAP**

Prepare

- **Review Self Monitoring**

- Are there any areas we haven't reviewed recently?
- Are there any gaps?
- Is any documentation missing that we can locate?
- IHBG: Do our activities fit our current approved IHP?

- **Are our policies up to date?**

- Are we following the policies?
- Do any of our processes differ from our policies?
- Are there work items we can close to align with our policies?
 - Examples: Workorders, Procurements, Recertification.

NwONAP Prepares

- **Preparation/Pre-site activities**
 - Review existing material
 - Audits
 - IHPs/APRs
 - Complaints, etc.
 - Request additional information
 - Policies/procedures
 - General ledger
 - Admissions & Occupancy Info



On-Site Review

look at systems

review sample
documents

implementation

accuracy/completeness

interview staff

inspections

Entrance Conference



INVITE

EXECUTIVE DIRECTOR AND STAFF,
HOUSING BOARD, AND COUNCIL
MEMBERS



PURPOSE

STAFF INTRODUCTIONS, DISCUSS WHAT
THE MONITORING VISIT WILL LOOK
LIKE, IDENTIFY WHICH STAFF TAKE THE
LEAD ON WHICH ACTIVITIES, SET
EXPECTATIONS

It's an open book test!

Monitoring Plans for Recipients

ONAP provides IHBG recipients with sample monitoring plans that they may use when conducting self-monitoring, as required under NAHASDA. Use of these sample monitoring plans is optional; however, the plans are designed to provide tribes and tribally designated housing entities (TDHE) with an effective, structured approach to evaluate performance and determine compliance with program requirements. The sample monitoring plans can also be used to conduct similar reviews of the Indian Community Development Block Grant (ICDBG), Rural Housing and Economic Development/Rural Innovation Fund (RHED/RIF), and Resident Opportunity and Self-Sufficiency (ROSS) programs. The plans are “living” documents and may change over time. Always use the plans available at this location. See Program Guidance 2012-03 for more information.

- [APR and IHP Compliance Monitoring Plan](#)
- [Lead-Based Paint Monitoring Plan](#)
- [Environmental Review Compliance Monitoring Plan](#)
- [General Instructions to Monitoring Plans](#)
- [Labor Standards Monitoring Plan](#)
- [Maintenance and Inspection Monitoring Plan](#)

Answer Key: https://www.hud.gov/program_offices/public_indian_housing/ih/grants/oversight

Admissions & Occupancy Sample



Office of Native American Programs

Admissions and Occupancy
Monitoring Plan
RECIPIENT

RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>W/P Pg.</u>	<u>Remarks</u>
III. On-Site Review				
A. All Programs (including homeownership, rental, tenant-based rental assistance, down payment assistance, emergency assistance, etc.)				
1. Identify sampling of multiple program occupancy records.				
2. Review the sampling methods in the General Instructions for Monitoring Plans.	24 CFR 1000.503			
3. Review the identified files for adequacy, accuracy, and completeness.				
a. <u>Low-income families</u> . Using the attached Tenant Files Review Form or the Occupancy Review Form, determine if the participating families were low income at the time they entered into the program. NOTE: It is up to the reviewer to select the most appropriate form for reviewing occupant files. The Tenant Files Review Form is good when the tribe/TDHE's files are program-based and the Occupancy Review Form is good for occupant-based filing systems.	NAHASDA, Sec. 205(a)(1)(A) – (D)	Tenant Files Review Form Occupancy Review Form		

We're also looking for good stories!

- Where has your housing program gone above and beyond?
- What could be replicated across the country?
- What has your program done to address needs specific to your Tribe?
- What's unique to your housing program?



Exit Conference



INVITE

EXECUTIVE DIRECTOR AND STAFF,
HOUSING BOARD, TRIBAL COUNCIL, AND
PUBLIC



PURPOSE

DISCUSS PRELIMINARY RESULTS OF THE
REVIEW


Draft Report



Final Report & Follow Up

- final determinations
- starts tracking of corrective actions
- available to public and under FOIA
- target dates/extensions
- manage process
- enforcement action if issues not addressed

Common Monitoring Findings


- **Admissions & Occupancy**
 - Inconsistent income calculations
 - Missing income support documentation
 - Missing waitlist/selection documentation
 - Not following internal policies
 - **Environmental Review**
 - Lack of documentation
 - Request for Release of Funds process
- 



- **Finance & Procurement**

- Separation of Duties
- Not following own policies
- Documenting bids
- Sole source process

- **Other**

- Policies don't match practices
 - Conflict of Interest notification
- 



Questions?

