Self-Monitoring and Evaluation Report and Management Improvement Plan

Indian Housing Plan Year 2014

for

Bering Straits Regional
Housing Authority

Self Monitoring and Evaluation Policy

This policy describes the monitoring strategy and plan, procedures, and follow-up to be used by the Tribe/TDHE to meet its self-monitoring requirements under NAHASDA.

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SECTION 1: INTRODUCTION

On September 26, 1996, President Clinton signed into law the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA). This law authorized or amended programs Administered by the Office of Native American Programs. Program regulations which implement this law are found at 24 CFR part 1000.

On December 14, 2002, HUD produced the NAHASDA Self-Monitoring Guidebook, upon which this report is based. This guidebook HUD provided information and compliance checklists that are used by Bering Straits RegionalHousing Authority to evaluate adherence to HUD regulatory requirements, and BSRHA operation and management standards. The Management Improvement Plan (MIP) which is included in this report is the result of the self-monitoring process.

The NAHASDA Self-Monitoring Guidebook recommends one of three methods by which recipients can conduct self-monitoring: Management Interviews, Facilitated Sessions, and Standard Operating Procedure Review. BSRHA utilized both Management Interviews with key operations staff, and Standard Operating Procedure Review of randomly sampled file documents for this assessment. In addition, the results of this report are reviewed and discussed in group sessions with staff and with the Board of Commissioners, and is submitted to the tribal consortium members for feedback and comments prior to its final adoption.

SECTION 2: MONITORING RESPONSIBILITIES

a. The Tribe or Tribally-Designated Housing Entity (TDHE) is responsible for monitoring grant activities to ensure compliance with applicable Federal requirements and monitoring performance goals under the Indian Housing Plan (IHP). Pursuant to §1000.502(a), these responsibilities include self-monitoring and the monitoring of sub-recipients.

b. If the recipient is a TDHE rather than an Indian Tribe, the grant beneficiary (the Indian Tribe) is responsible for monitoring programmatic and compliance requirements of the IHP and NAHASDA [§1000.502(b)] by requiring the TDHE to prepare periodic progress reports including the Annual Performance Report and fiscal audit reports.

c. HUD responsibilities for reviewing recipients are set forth in §1000.502 as referenced in §1000.502(c). HUD monitoring will consist of on-site review and off-site review of records, reports and audits [§1000.502(d)]. Section 1000.520 requires HUD to review, at least annually, each recipient's performance to determine whether it has carried out its eligible activities in a timely manner, has carried out its eligible activities and certifications in accordance with the requirements and the primary objective of NAHASDA and with other applicable laws, and whether the recipient has a continuing capacity to carry out those activities in a timely manner.

SECTION 3: ANNUAL MONITORING STRATEGY AND PLAN

Bering Straits RegionalHousing Authority has established a Self-Monitoring policy for each fiscal year:

- Management Interviews will be conducted in December of each year, random files reviewed and a draft report completed by the end of January of the following year. Not later than February 28th the report and attached evaluations are submitted the Board of Commissioners, the Tribes, and to the staff.
- Self-Monitoring evaluations and draft report will be completed by an individual or entity who works at arms-length from direct operations, by interviewing, at a minimum, the following positions: Executive Director, Fiscal Director, Housing Manager, Development Coordinator, Modernization Coordinator, Housing Maintainance Staff and those Housing Management Staff reponsible for eligibility and selections.
- All applicable Evaluations and Interviews are utilized to give a comprehensive picture of BSRHA operations and procedures .
- Evaluations are conducted annually, unless deficiencies were noted on the prior Management Improvement Plan (MIP), and for those areas monitoring will be conducted semi-annually.
- Appropriate actions will be taken to resolve any identified deficiencies or concerns.

SECTION 4: RESOLUTION OF NONCOMPLIANCE AREAS AND ISSUES

The Management Improvement Plan (MIP) is included with this report, with target dates and corrective actions to ensure resolution and to prevent the recurrence of any deficiencies.

The MIP is submitted to the Board of Commissioners and ConsortiumTribal Councils in January with the Self-Evaluation Report. The Board of Commissioners and Tribal Councils will provide oversight as necessary to ensure that all deficiencies are corrected and concur on the closure of each deficiency.

SECTION 5: MONITORING EVALUATIONS

ATTACHED

Indian Housing Block Grant Recipient
Self-Monitoring And Evaluation

APR Development Process and IHP Monitoring Self-Monitoring Checklist for Program Year 2014

APR Development Process and IHP Monitoring	Yes	No	N/A	Source/ Documentation
1. Are activities consistent with the approved IHP?	X			2014 IHP and associated programs.
2. Is progress consistent with the one-year goals and objectives in the IHP?		X		2013 Previous goals.
3. Is program progress consistent with progress reported in the APR?	X			2014 APR completed by January 23, 2015.
4. Is the number of low-income families being assisted consistent with the IHP?	X			2014 IHP outcome estimates.
5. Is there evidence that the number of families in the jurisdiction or the number of low income families in the jurisdiction are consistent with the IHP or formula allocation?	X			No tribes have contested the formula allocation. IHBG data on file.
6. Is available data consistent with the recipient's description of the housing market?	X			AHFC cold climate research assessment data.
7. Is there evidence that the recipient has coordinated NAHASDA activities with other governmental agencies?	X			Tenant/homebuyer files show coordination with tribal and municipal governments as needed.
8. Is there evidence that the recipient has coordinated with welfare agencies?	X			Tenant and homebuyer files.
9. For 1937 Act units that have been demolished or disposed of, has one of the following conditions been met? a) A financial analysis was done and demonstrates cost-effectiveness; b) The unit was condemned by the government with authority over the unit; c) The unit was an imminent threat to the health and safety of residents; or d) Continued habitation of the unit was inadvisable due to cultural or historic considerations.	X			Unit files.
APR Development Process and IHP Monitoring	**Yes**	**No**	**N/A**	
10. Was HUD notified of any planned demolition or disposition prior to any action being taken?	X			Correspondence on file of HUD contact.
11. For disposition of 1937 Act units, were sale proceeds maximized or, alternatively, was the unit sold to a low-income Indian family?	X			Maximized for bid via public notice in affected community.
12. If 1937 Act units have been disposed of or conveyed, have they been reported as such for Formula Current Assisted Stock (FCAS) purposes?	X			Unit files show correspondence with Formula Center.
13. Are financial resources other than HUD-funded grants available as stated in the IHP?	X			Program Income.
14. Has the recipient executed a local cooperation agreement with all appropriate local governments?	X			BSRHA issues cooperative agreements with local governments on land use issues. BSRHA Project Files.

Reviewer _____ Date of Review 1/8/15

Indian Housing Block Grant Recipient
Self-Monitoring And Evaluation

Organizational Control Environment Self-Monitoring Checklist for Program Year 2014

Organizational Control Environment	Yes	No	N/A	Source/ Documentation
Integrity and Ethical Values				
1. Does the organization maintain a written code of conduct or ethics?	X			Personnel Policy & Procedure.
2. Do all staff make annual confirmations that they understand and comply with the code of conduct?	X			Personnel Policy & Procedure.
3. Does a published organization chart exist in the TDHE or tribal housing department?	X			Posted in main area of office.
4. Are reporting lines clear to avoid duplicate responsibilities?	X			Organizational Chart.
5. Is there the proper delegation of authority and responsibilities?	X			Policy & Procedures, Job Descriptions.
6. Does the organizational structure support internal controls?	X			All BSRHA Policies.
7. Is the recipient's staffing adequate?	X			All positions filled.
8. Is there evidence of frequent staff turnover?		X		
9. Is staff receiving adequate training?	X			Staff can always benefit from additional training.
Organizational Bylaws				
10. Does the BSRHA operate with Bylaws adopted by a Board?	X			BSRHA BOC Bylaws.
11. Are the Bylaws consistent with tribal ordinances and practices?	X			BSRHA BOC Bylaws.
Governing Board				
12. Are Board meetings held in accordance with the Bylaws?	X			
13. Are Board resolutions and minutes maintained and available for public access?	X			
14. Are Board members provided quarterly financial statements and progress reports?	X			Monthly & Progress Reports.
15. Does the Board maintain established criteria to evaluate the performance of the Director?	X			Annual Review & Personnel File, Job Description & Contract.
16. Does the Board conduct a performance evaluation of the Director on an annual basis?	X			See 15 above.
Organizational Control Environment	**Yes**	**No**	**N/A**	**Source/ Documentation**
Policies and Procedures				
17. Do written policies and procedures exist that encompass personnel, financial management, procurement, and housing assistance program areas?	X			All Polices are shared on Common Drive & reviewed regularly.
18. Is there an established process for documenting compensation comparability of staff positions?	X			Davis Bacon Act, Kawerak Salary Schedule, Salary Grade Regularly.

19. Are reimbursements for staff travel explicitly defined?	X			Personnel, CBA, Finance.
20. Are personnel position descriptions accurate and current?	X			Positions common drive & Personnel Files.
Records Management				
21. Are records maintained for a period of 3 years from the last APR submission?	X			Personnel Files & Records Retention Files.
Self-Monitoring Policy				
22. Has a written self-monitoring policy been adopted by the organization?	X			Resolution 91-414.
23. Do tribal officials monitor HUD grants without undue interference?	X			IHP, APR, Board Meeting Minutes.
24. Does the organization conduct self-monitoring on a regular basis?	X			Annually, December & January.
Monitoring of Sub recipients				
25. Was there a budget established for the project?	X			Youth Grant Regularly Basis.
26. Does there exist a written agreement with each sub recipient?	X			Youth Grant Sub-recipient Agreement.
27. Does the contract or agreement clearly address or establish:	X			
a) a statement of work?	X			
b) an operating budget?	X			Not to exceed $10,000.
c) reporting requirements for self-monitoring?	X			
28. Does the recipient monitor sub recipients on site at least annually or more often if the contract requires it?	X			
29. Does the recipient follow up on any findings to assure that corrective measures or actions were taken?	X			If necessary.
Organizational Control Environment	**Yes**	**No**	**N/A**	**Source/ Documentation**
Complaint and Grievance Resolution				
30. Does the organization have written policies and procedures for addressing complaints and formal grievances?	X			Personnel Policy & Procedure Manual, CBA, Admissions & Occupancy Policy I & II.
31. Is there a method to track complaints and formal grievances to ensure timely follow up and response?	X			HDS, Personnel Policy & Procedure Manual, CBA, Admissions & Occupancy Policy I & II.
32. Do formal grievance procedures provide for a hearing before an impartial hearing official or panel?	X			HDS, Personnel Policy & Procedure Manual, CBA, Admissions & Occupancy Policy I & II.
33. Is there a method to ensure that the cause of validated complaints and grievances are addressed to prevent reoccurrence?	X			Follow up conversation & written correspondence.

Open Findings				
34. Are there any open findings in this area identified by either HUD and/or auditor?		X		
• If yes, summarize the finding(s):			X	
What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)?			X	
a) What is the current status of the finding(s) as of the date of this evaluation?			X	
b) What is the tribe's/TDHE's target date for responding to HUD or auditor findings?			X	

Reviewer _____ Date of Review 1/8/15

Indian Housing Block Grant Recipient
Self-Monitoring And Evaluation

Resident Eligibility and Service Standards Checklist for Program Year 2014

Resident Eligibility and Service Standards	Yes	No	N/A	Source/ Documentation
Statutory/Regulatory Requirements				
1. Is adequate insurance coverage maintained on all units owned, operated, or assisted with IHBG funds?	X			AMERIND Insurance, see AP vendor file.
2. Has the useful life been defined for all applicable units?	X			Under NAHASDA, see Home Buyer file.
3. Are units receiving NAHASDA assistance maintained as affordable during their useful life?	X			Home Buyer file.
Eligibility				
4. Is there a written policy on family income eligibility readily available to staff and posted for public access?	X			Admission's & Occupancy Policy/ Homebuyer files.
5. Are the most current HUD-determined income limits being used for eligibility criteria?	X			Admission's & Occupancy Policy/ Homebuyer files.
6. If no, has no more than 10% of an IHBG fund been used to assist families whose incomes fall within 80% to 100% of the median income?			X	
7. Are only low-income Native American families determined eligible?		X		Admission's & Occupancy Policy/ Homebuyer files.
8. Are you in compliance with the requirements, with no exceptions?	X			Home buyer files.
9. If there are exceptions, why? (e.g., non-low-income families require HUD approval)			X	
10. If assistance was provided to a non-Indian family, is there documentation that the presence of the family is essential to the well-being of Indian families and the need for housing for this family cannot otherwise be met?	X			According to A&O Policy. If there in one the IRA would have to submit a letter requesting permission for consideration.
Resident Eligibility and Service Standards	**Yes**	**No**	**N/A**	**Source/ Documentation**
11. Does the family income eligibility review include rent-paying habits and/or credit checks?	X			Background check in Applicant's Home buyer/tenant file.
12. Are applicants adequately counseled on IHBG program requirements?	X			Home buyer/tenant file.
13. Is the waiting list adequately maintained and documented and dated with offers?	X			Home buyer/tenant file.
14. Are applicants determined to be "ineligible" notified of reasons and options available to them?	X			Home buyer/tenant file.
Selection				
15. Is there a written policy on selection preferences, if any, readily available to staff and posted for public access?	X			Applicant worksheet & in the Admission's & Occupancy policy.

16. Are the admissions of selected participants documented adequately to reflect compliance with Board policies? For example, signed and dated rating forms for each selection?	X			Admissions & Occupancy Policy/Home buyer file.
17. Are incomes verified to be within the income limits prior to execution of a housing assistance contract or agreement?	X			NLR 30%, MH 15% or under within income range, in the Admissions & Occupancy Policy.
18. Are all "contracts for housing assistance" between the recipient and the participant signed and dated and maintained in a unique confidential household file?	X			Home Buyer File
19. Are selected participants counseled on their housing assistance responsibilities?	X			According to the Admissions & Occupancy Policy, Also a copy is given to Home Buyer. A counseling checklist is documented in the Home Buyer File.
Rent and Payment Determination Checklist				
20. Is there a written policy on rent and payment determination readily available to staff and posted for public access?	X			Admission's & Occupancy Policy, and 30% of annual income.
21. Are payments calculated according to policy requirements?	X			Admission's & Occupancy Policy.
22. Are all IHBG-assisted families paying 30% or less of their adjusted gross income for housing assistance?	X			Nome Low Rent 30% & Mutual Help 15%, also in the Admission's & Occupancy Policy.
23. Are verifications of income properly documented in unique household files?	X			
Resident Eligibility and Service Standards	**Yes**	**No**	**N/A**	**Source/ Documentation**
Occupancy Do you have a written occupancy policy that:				
24. Does not contain unreasonable terms or conditions?	X			Admission's & Occupancy Policy.
25. Requires the owner or manager to maintain the housing in compliance with applicable housing codes and quality standards?	X			Admission's & Occupancy Policy & Home Buyer Files
26. Requires the owner or manager to give adequate written notice of termination of the lease, which shall be the period of time required under state, tribal, or local law?	X			Admission's & Occupancy Policy & the State of Alaska Landlord & Tenant Law.
27. Specifies that, with respect to any notice of eviction or termination, notwithstanding any state, tribal or local law, a resident shall be informed of the opportunity, prior to any hearing or trial, to examine any relevant documents, records, or regulations directly related to the eviction or termination?	X			Tenant & Homebuyer File
28. Requires that the owner or manager may not terminate the tenancy, during the term of the lease, except for serious or repeated violation of the terms or conditions of the lease, violation of applicable federal, state, tribal, or local law, or for other good cause?	X			Admission's & Occupancy Policy.
29. Provides that the owner or manager may terminate the tenancy of a resident for any activity, engaged in by the resident, any member of the household of the resident, or any guest or other	X			Admission's & Occupancy Policy.

person under the control of the resident, that –				
a) Threatens the health or safety of, or right to peaceful enjoyment of the premises by, other residents or employees of the owner or manager of the housing?	X			Admission's & Occupancy Policy.
b) Threatens the health or safety of, or right to peaceful enjoyment of the premises by, persons residing in the immediate vicinity of the premises?	X			Modernization Files.
c) Is criminal activity (including drug-related criminal activity) on or off the premises?	X			Tenant/Homebuyer File.
Maintenance and Inspections/Management				
30. Are all participant files properly documented per required Policy actions?	X			Tenant/Homebuyer File.
31. Are inspections of applicant units fully completed and documented in files?	X			Tenant/Homebuyer File.
32. For Rehabilitation programs:				
a) Have policy standards for the type, cost-effectiveness and cost of rehabilitation of a home been followed?	X			Tenant/Homebuyer File.
b) Was the Scope of Work (work order) for rehabilitation completed within budget and timeframes for each unit?	X			Modernization Files.
c) Is there follow-up on rehabilitation work completed to ensure quality workmanship?	X			Tenant/Homebuyer File.
Resident Eligibility and Service Standards	**Yes**	**No**	**N/A**	**Source/ Documentation**
33. For homeownership programs:				
a) Have policy standards for the type, cost-effectiveness and cost of new homes been followed?	X			Purchase Price schedule done by Shane Morris, see Tenant/Home Buyer file.
b) Was the Scope of Work (work order) for new construction completed within budget and timeframes for each unit?	X			Competed on time frame and on Budget.
c) Is there follow up on construction work completed to ensure quality workmanship?	X			Contractor & Shane Morris, to Inspect Unit.
d) Are post-occupancy inspections conducted?	X			Tenant/Homebuyer File.
Public Dissemination				
34. Do you have a written eligibility policy that is publicly available?	X			Posted on the board in the Front Desk Area.
35. Do you have a written selection policy that is publicly available?	X			Posted on the board in the Front Desk Area.
36. Do you have a written rent or payment determination policy that is publicly available?	X			Posted on the board in the Front Desk Area.
37. Do you have a written occupancy policy that is publicly available?	X			Posted on the board in the Front Desk Area.
38. Do you have a written maintenance policy that is publicly available?	X			Within the Admissions and Occupancy Policy.
39. Do you have a written grievance policy that is publicly available?	X			Within the Admissions and Occupancy Policy.
40. Do you have a written collections policy that is publicly available?	X			Admission's & Occupancy Policy.

Collections				
41. Are all provisions of the tribe/TDHE collections policy enforced consistently?	X			Admission's & Occupancy Policy.
42. Are delinquency notices sent out consistently at the beginning of each month?	X			After the 15TH of the month. Per Admission's & Occupancy Policy.
43. Does the Tribal Council evidence support of collection efforts for delinquent payments?	X			Admission's & Occupancy Policy. And Delinquent Accounts are sent to Rural Credit Services for Collections.
44. What is the current balance for delinquencies from assisted households?	X			$255,594.54 (Mutual Help & Nome Low Rents).
45. Is this an increase within the last six months?		X		Decreased balance from Assignment of Rights.
Lead-based paint				
Are you assisting dwelling units constructed before 1978? (lead-based paint questions deleted)		X		
Temporary Relocation/Acquisition				
54. Did you inform the owner of the amount you believe to be the fair market value of the property before discussing the purchase price?			X	Yes to Acquisitions, No for NAHASDA.
55. Did you have the property appraisal prepared by a qualified appraiser?			X	
56. Did you tell the owner that you will be unable to acquire the property if negotiations fail to result in an amicable agreement?			X	
Resident Eligibility and Service Standards	**Yes**	**No**	**N/A**	**Source/ Documentation**
57. If the proposed acquisition payment exceeds the fair market value, did you request HUD approval of the proposed acquisition price before executing a firm commitment to purchase the property?			X	No Displacement occurred in 2014.
58. Did you take all reasonable steps to minimize displacement of persons (households, businesses, nonprofit organizations, and farms) as a result of a project assisted by IHBG funds?			X	No Displacement occurred in 2014.
59. Did you provide temporarily relocated residential tenants and homebuyers with reimbursement for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation, including the cost of moving to and from the temporarily occupied housing and any increase in monthly housing costs (e.g., rent/utility costs)?			X	No Displacement occurred in 2014.
60. Did you provide temporarily relocated residential tenants and homebuyers with reasonable advance written notice of:			X	No Displacement occurred in 2014.
a) The date and approximate duration of the temporary relocation?			X	No Displacement occurred in 2014.
b) The location of the suitable, decent, safe, and sanitary dwelling to be made available for the temporary period?			X	No Displacement occurred in 2014.
c) The terms and conditions under which the tenant may occupy a suitable, decent, safe, and sanitary dwelling in the building/complex following completion of the repairs?			X	No Displacement occurred in 2014.

d) The provisions for reimbursement?			X	No Displacement occurred in 2014.
61. If relocation was necessary, did you provide relocation assistance for displaced persons at the levels described in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR part 24?			X	No Displacement occurred in 2014.
62. Did you certify that you will comply with the URA, the regulations at 49 CFR part 24, and the requirements of 24 CFR §1000.14?			X	No Displacement occurred in 2014.
63. Did you maintain records in sufficient detail to demonstrate compliance with these regulations?			X	No Displacement occurred in 2014.
Open Findings				
64. Are there any open findings in this area identified by either HUD and/or auditor?			X	No Displacement occurred in 2014.
a) If yes, summarize the finding(s):			X	No Displacement occurred in 2014.
b) What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)?			X	No Displacement occurred in 2014.
c) What is the current status of the finding(s) as of the date of this evaluation?			X	No Displacement occurred in 2014.
d) What is the tribe's/TDHE's target date for responding to HUD or auditor findings?			X	No Displacement occurred in 2014.

Reviewer Colleen Medlin Date of Review 1/7/2015

Fiscal and Financial Management Checklist for Program Year 2014

Fiscal and Financial Management	Yes	No	N/A	Source/ Documentation
Reporting				
1. Are reports (e.g., HUD-272-I Federal Cash Transaction Report, quarterly submission) submitted in a timely manner?	X			Records and files with CFO.
2. Are you notice-free (no notices from HUD on the accuracy of the reports submitted)?	X			Records and files with CFO.
3. Have you always maintained access to LOCCS due to timely reporting?	X			Records and files with CFO.
4. Do financial reports and statements present a clear picture of financial results and condition?	X			Monthly & Quarterly Reports.
5. Are data available for the preparation of reports on:				
a) Current month and year-to-date activities versus budget?	X			Files and electronic Back up in Finance Dept.
b) Current month versus same month prior year actuals?		X		Quarterly and Yearly Actuals.
c) Current year-to-date versus prior year-to-date?	X			Financial Quarterly Reports. Files and Electronic Back up in Finance Dept.
d) Exception reporting of variances in excess of predefined percentage or dollar amount?			X	
Audits				
6. Do you maintain all of the information and data needed for an annual audit?	X			Files and Electronic back up in Finance Dept.
7. Did you submit your last annual audit in a timely manner?	X			Records and files with CFO.
8. Are you taking steps to prepare in advance for your upcoming annual audit?	X			Records and files with CFO.
Budget				
9. Have detailed budgets been estimated for each activity?	X			IHP budget.
10. Do accounting records allow and provide for the comparison of actual expenditures with budgeted amounts for each grant?	X			CFO provided monthly financial statements.
11. Is there evidence that the grant recipient periodically (at least once a quarter) compares actual to budgeted expenditures?	X			CFO provided monthly financial statements.

Fiscal and Financial Management	Yes	No	N/A	Source/ Documentation
12. Do accounting records include tracking of expended/unexpended and obligated/Unobligated balances?	X			CFO provided monthly financial statements.
13. Are program budgets revised and approved, when necessary, in accordance with program requirements?	X			BSRHA/HUD finance policies.
14. Does a regular budget control review occur, covering areas of:				
a) Administrative expenses?	X			Records and files with CFO & Finance Dept.
b) Labor overtime?	X			Records and files with CFO & Finance Dept.
c) Direct and indirect labor?	X			Records and files with CFO & Finance Dept.
15. Do managers of all the various affected functions of the organization participate in the development of budgets?	X			IHP, Tenant and project files and electronic back up.
16. Is adequate information available at the time budgets must be prepared in order to develop meaningful budgets?	X			Records and files with CFO & Finance Dept.
17. Are data reported against budgets accurately (if actual) or fairly (if allocated)?	X			CFO provided monthly financial statements.
Drawdowns				
19. Does the release of the check for payment of program costs occur within 3 days of the deposit of funds?			X	Approved for investing.
20. Are Request Vouchers for payment:				
a) Prepared?	X			
b) Accurate?	X			
c) Documented?	X			
21. Are the established internal controls for requesting funding followed?	X			
Accounting Records Checklist				
22. Do the accounting records adequately identify the source and application of funds provided in the following areas:				
a) Obligations?	X			CFO provided monthly and quarterly financial statements.
b) Unobligated balances?	X			CFO provided monthly and quarterly financial statements.
c) Assets?	X			CFO provided monthly and quarterly financial statements.

d) Liabilities?	X			CFO provided monthlyand quarterly financial statements.
e) Outlays/expenditures?	X			CFO provided monthly and quarterly financial statements.
f) Income?	X			CFO provided monthly and quarterly financial statements.
g) Sub recipient awards or obligations?			X	
23. Are cash receipts/cash disbursement journals current and accurate?	X			CFO provided monthly and quarterly financial statements.
Fiscal and Financial Management	**Yes**	**No**	**N/A**	**Source/ Documentation**
24. Are bank statements reconciled monthly and in a timely manner?	X			Records and files with CFO & finance dept.
25. Are bank reconciliations free of discrepancies?	X			Records and files with CFO & finance dept.
26. If discrepancies exist, are they investigated and resolved?	X			Records and files with CFO & finance dept.
Internal Controls				
27. Is there segregation of duties in terms of financial transactions?	X			BSRHA financial policies.
28. Do you have a policy on who in your organization can authorize payments?	X			BSRHA financial policies.
29. Are all disbursements accompanied by adequate documentation, in the form of receipts or an invoice?	X			Finance dept. vendor files.
Cash Management — Cash Receipts				
30. If the cash receipts process is computerized, is system security adequate?	X			BSRHA financial policies.
31. Is there adequate separation of responsibility in the receipt, recording, and deposit of cash receipts?	X			BSRHA financial policies.
32. Are cash funds secured?	X			Finance dept. safe.
33. Are all funds deposited at least weekly?	X			Night deposit drops.
34. Do you use and issue pre-numbered cash receipts in numerical order?	X			System generated.
35. Are all cash receipts accounted for?	X			Records and files with finance dept.
36. Are deposit slips free of erasures or alterations?	X			Records and files with finance dept.

37. If staff handling cash transactions have been replaced within the last 6 months, were appropriate security measures taken regarding former employees; e.g., LOCCS authority, safe combinations?			X	
38. Are there employee IOU notes or personal checks (exclusive of cash receipts for legitimate housing payments)?		X		Not permitted.
39. Do you have a separate budget and separate accounts for IHBG funds?	X			IHP & account coding.
Cash Disbursements				
40. Are all disbursements, except those from petty cash, made by pre-numbered checks?	X			System generated.
41. If program income is received, is this income disbursed on affordable housing activities?	X			IHP & finance reports.
42. Are all expenditures supported by invoices, contracts, purchase orders, etc.?	X			Records and files with finance dept. vendors.
43. Are all direct salaries and wages of employees supported by time cards?	X			Records and files with finance dept. payroll.
44. Are direct salaries that are prorated supported by time distribution records?			X	
45. If the cash disbursements system is computerized, is the system security adequate?	X			Password protection.
Fiscal and Financial Management	**Yes**	**No**	**N/A**	**Source/ Documentation**
46. Are all of the checks in order (i.e., not missing, voided, or altered?	X			Records and files with finance dept.
47. If authorized, do petty cash and/or change fund(s) reflect what is on the general ledger?	X			Records and files with finance dept.
48. Are cash counts done randomly, with documented regularity?	X			Records and files with finance dept.
49. Do the on-site cash counts of petty cash and/or change fund show that these are free of discrepancies?	X			Records and files with finance dept.
50. Is there a written prohibition against signing checks in advance?	X			BSRHA financial policies
51. Are all expenditures approved in advance by authorized persons?	X			Records and files with finance dept.
52. Are unpaid invoices maintained in an unpaid invoice file?	X			Records and files with finance dept. and MOD dept.
53. Are invoices from unfamiliar or unusual vendors reviewed and approved for payment by authorized personnel who are independent of the invoice processing function?	X			BSRHA financial policies
54. If the organization keeps an accounts payable register, are payments promptly recorded in the register to avoid double payment?	X			MIP software suite
55. Is a cash disbursement voucher prepared for each invoice or request for reimbursement that details the date of check, check number, payee, amount of check, description of expense account (and restricted fund) to be charged, authorization signature, and accompanying receipts?	X			Records and files with finance dept.

56. Is a cash disbursement journal prepared monthly that details the date of check, check number, payee, amount of check, and columnar description of expense account (and restricted fund) to be charged?	X			System generated.
57. Are advance payments to vendors and/or employees recorded as receivables and controlled in a manner which assures that they will be offset against invoices or expense vouchers?	X			Records and files with finance dept.
Investments/Banking				
58. Are IHBG funds in one or more accounts separate from other funds?	X			Records and files with CFO.
59. Are accounts insured by an agency or instrumentality of the U.S. or fully collateralized to ensure protection of the funds even in the event of bank failure?	X			Records and files with CFO.
60. Do you have an executed General Depositary Agreement?	X			Records and files with CFO.
61. Is cash in excess of immediate need identified and invested?	X			Records and files with CFO.

Fiscal and Financial Management	**Yes**	**No**	**N/A**	**Source/ Documentation**
62. Are funds invested in instruments or obligations that meet the requirements of 24 CFR §1000.58(a), including: Obligations of the United States; obligations issued by Government-sponsored agencies; securities that are guaranteed or insured by the United States; mutual (or other) funds registered with the Securities and Exchange Commission and which invest only in obligations of the United States or securities that are guaranteed or insured by the United States; or accounts that are insured by an agency or instrumentality of the United States or fully collateralized to ensure protection of the funds, even in the event of bank failure.	X			Records and files with CFO.
63. Have you provided adequate insurance against loss from fire, weather, and liability claims for all housing units you own or operate?	X			BSRHA insurance files and electronic back up.
64. Do you require contractors and subcontractors to either provide insurance covering their activities or negotiate adequate indemnification coverage to be provided in their contract with you?	X			Project files and electronic back up.

65. Do you use an Insurance Register to track all insurance activity?	X			BSRHA insurance records
Allowable Costs				
66. When you do a periodic check of expenditures, do you find that all expenditures were necessary and reasonable for proper and efficient administration of the program, as related to:				
a) Salaries and related costs?	X			Records and files with finance dept. and project files.
b) Administrative service contracts (e.g., legal, account, audit, consulting)?	X			Records and files with finance dept. and project files.
c) Travel expenditures?	X			Records and files with finance dept. and project files.
d) Other administrative costs?	X			Records and files with finance dept. and project files.
67. Does a review of program expenditures reveal compliance with rules regarding unallowable costs as addressed in Attachment A of OMB Circular A-87, or identified in attachment B of that circular, including in the areas of :				
a) Entertainment?	X			Audit reports.
b) Contributions and donations?	X			Audit reports.
c) Fines and penalties?	X			Audit reports.
d) General governmental expenditures including salary and expenses of staff and Commissioners?	X			Audit reports.
e) Other (Please Specify) (From soda sales-food for meetings)				
68. Do you ensure that no costs related to political activities are charged to the IHBG program?	X			CFO & BSRHA policies.
69. Do you subtract all applicable credits before charging costs to the IHBG program?	X			Records and files with finance dept.
Fiscal and Financial Management	**Yes**	**No**	**N/A**	**Source/ Documentation**
70. Are all costs charged to the IHBG program allocable to the program and not included as a cost of any other federally-financed program in either the current or a prior period?	X			No other federal funds were utilized in 2014.
71. Are indirect grantee costs charged to the IHBG program only with support from an indirect cost proposal/cost allocation plan?			X	Indirect costs are charged to unrestricted funds.
72. If there is staff working on non-NAHASDA program activities, is the allocation of their salaries computed appropriately?	X			Account coding per program.
73. Is the percentage of IHBG funds used for administrative costs the same as the percentage stated in the IHP?	X			Records and files with CFO.
74. Does a review of program activities establish that all IHBG funds were spent or obligated for affordable housing activities as defined in Section 202 of the Act?	X			Audit reports.

Open Findings				
75. Are there any open findings in this area identified by either HUD and/or auditor?		X		There were no open findings in the 2014 Audit report.
a) If yes, summarize the finding(s):			X	
b) What entity (or organizational unit) has been assigned responsibility for clearing the finding(s)?			X	
c) What is the current status of the finding(s) as of the date of this evaluation?			X	
d) What is the tribe's/TDHE's target date for responding to HUD or auditor findings?			X	

Reviewer _____ Date of Review 1/9/15

Procurement and Contract Administration Checklist for Program Year 2014

Procurement and Contract Administration	Yes	No	N/A	Source/ Documentation
Procurement Planning				
1. Do you engage in periodic procurement planning, including independent cost estimates?	X			Procurement, construction & accounting files.
Conflict of Interest				
2. Do you have a **written code of standards of conduct** governing the performance of your employees engaged in the award and administration of contracts?	X			Procurement policy.
Small Purchases				
3. Can staff document receipt of an adequate number of price or rate quotations from qualified sources for procurements of $100,000 or less?	X			Accounting Vendor files & EREQ system-MIP.
Competitive Sealed Bids (Formal Advertising)				
4. Did the staff receive at least two responsive bids from responsible bidders for each procurement transaction?			X	VP working files one sealed bid received for debt collections.
5. Did the procurement lend itself to a firm-fixed-price contract and could selection of the successful bidder be made principally on the basis of price?			X	VP working files.
6. Did staff advertise the Invitation For Bid (IFB) in a publication of general circulation?			X	VP working files.
7. Were bids solicited from an adequate number of potential bidders?			X	VP working files, outreach made to four collection agencies.
8. Did the IFB, including specifications and pertinent attachments, clearly define the items or services needed in order for the bidders to properly respond to the invitation?			X	RFP for debt collections.
9. Were all bids assessed against the same award evaluation criteria?			X	VP working files.
10. Were all bids opened publicly at the time and place stated in the IFB?			X	BSRHA boardroom.
11. Was the contract awarded to the lowest responsive and responsible bidder?			X	VP working files.

Procurement and Contract Administration	Yes	No	N/A	Source/ Documentation
Competitive Proposals				
12. Was this procurement method utilized only when conditions were not appropriate for the use of competitive sealed bids?	X			Construction files McClintock & associates vendor RFP for A&E services 2014, very defined for surveying.
13. Were the proposals solicited from an adequate number of qualified sources, consistent with the nature of the procurement?	X			Contract files/vendor files.
14. Did the staff publicize the RFP and honor reasonable requests by parties to compete to the maximum extent practicable?	X			Project contract files.
15. Did the RFP identify all significant evaluation factors, including price or cost where required, and their relative importance?	X			Contract files/Construction files.
16. Did staff use a method for conducting technical evaluations of the proposals received and documenting the selection of awardees?	X			Construction RFP Scoring Matrix & accounting files.
17. Did staff make awards to the most responsive and responsible offertory whose proposals would be most advantageous to the recipient after price and other factors were considered?	X			Construction files/accounting files.
18. If proposals involving A/E professional services were evaluated with respect to factors other than price, did staff document the basis for negotiation of fair and reasonable compensation?			X	Construction files/accounting files.
Noncompetitive Proposals				
19. Can the staff show that another method of procurement (small purchases, sealed bids or competitive proposals) was not feasible because: the item was only available from a single source; or, a public exigency or emergency was of such urgency to not permit use of competitive solicitation; or, after solicitation of a number of sources, competition was determined inadequate?	X			Unalakleet Building Supply vendor files.
20. If the answer is No, was approval given by HUD for use of this method?				
Contractor Qualifications				
21. Do you do business only with responsible contractors who have the ability to perform the required work, both financially and technically, and who have a satisfactory record of integrity, past performance, and compliance with applicable rules and regulations?	X			Contract files-verification through debarred list-HUD-GOV.

Procurement and Contract Administration	Yes	No	N/A	Source/ Documentation
General Provisions/Procedures Checklist 22. To ensure that you are following the general procedures for procurement, pull a sample of procurement case files (three to five, depending on your organization's procurement activity). Spot check these to answer the following questions:				
23. Was there a rationale in the file for:				
a) The selection of the method of procurement?	X			Accounting contract files Kodiak Island Native.
b) The selection of contract type?	X			Accounting contract files.
c) The contractor selection or rejection?	X			Accounting contract files.
d) The basis for the cost or price of the contract?	X			Accounting contract files.
24. Is contract pricing always based on a method other than the "cost-plus-a-percentage-of-cost" method?		X		Based on firm fixed prices.
25. Are purchase orders and contracts signed by an authorized program official?	X			EREQ.
26. Are items that are delivered and paid for consistent with the items contained in the corresponding purchase order and/or contract?	X			Accounting contract files Kodiak Island Native Supply
27. Are vendors paid in a timely manner once requested orders have been delivered, inspected, and accepted and payment of the vendor has been approved?	X			Accounting contract files.
28. Is a cost or price analysis performed in connection with every procurement action, including contract modifications?	X			Accounting contract files.
29. Were the contract provisions listed in 24 CFR §85.36(i) appropriately included in the grant-assisted contracts?	X			TBI contractor files.
30. Can staff document a system of contract administration for determining the adequacy of contractors' performance?	X			Accounting contract files.
31. If applicable, can the staff show that the sub-recipients are required to follow applicable procurement policies and procedures in the administration of their contracts and purchase orders?	X			Youth grant files.

Procurement and Contract Administration	Yes	No	N/A	Source/ Documentation
Bonding and Insurance				
32. If contracts have been awarded for construction or facility improvements under the grant program(s), did the staff:				
a) Follow its own requirements relating to bid guarantees, performance bonds, and payment bonds for construction contracts or subcontracts valued at or below $100,000?	X			TBI contractor files.
b) Meet the minimum federal requirements for bid guarantees, performance bonds and payment bonds (24 CFR §85.36(h)) or the alternatives set forth in 24 CFR §1000.26(a)(12) for construction contracts or subcontracts valued above $100,000?	X			TBI contractor files.
Procurement Preferences				
33. Have you certified to HUD that your adopted policies and procedures will provide preference in procurement activities consistent with the requirements of section 7(b) of the Indian Self-Determination and Education Assistance Act?	X			Procurement policy.
34. Has the staff attempted, to the greatest extent feasible consistent with Indian Preference requirements, to award contracts for work to be performed under the programs to business concerns which provide economic opportunities to low- and very low-income persons who are residents of NAHASDA-assisted housing or who live in the metropolitan or non-metropolitan county in which the programs are undertaken?			X	No vendors are residents of BSRHA homes.
35. Do staff take affirmative steps to use small, minority-owned, and women-owned businesses in grant funded contracts such as:				
a) Including such businesses on solicitation lists whenever they are potential sources?	X			Contract & survey RFP files.
b) Ensuring that such businesses, when identified, are solicited whenever they are potential sources?	X			Unalakleet Building files.
c) Dividing procurement requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by such businesses?	X			Unalakleet building files.
d) Requiring prime contractors when subcontracts are let, to take affirmative steps to select small, minority-owned and women-owned businesses in grant funded contracts?	X			Contract & survey RFP files.
Contract Administration				
36. Once the contract is awarded, do you ensure that supplies, services, or construction under contract are performed in an acceptable manner?	X			Construction files BSRHA inspections documented w/pictures.
37. Do you notify the contractor promptly whenever unacceptable work is done?	X			Construction files.
38. Do you only pay for acceptable work?	X			Construction files.

Procurement and Contract Administration	Yes	No	N/A	Source/ Documentation
Open Findings				
39. Are there any open findings in this area identified by either HUD and/or auditor?		X		No open findings.
a) If yes, summarize the finding(s): Questioned docs re: policy, price, preference			X	No open findings.
b) What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)?			X	No open findings.
c) What is the current status of the finding(s) as of the date of this evaluation?			X	No open findings.
d) What is the tribe's/TDHE's target date for responding to HUD or auditor findings?			X	No open findings.

Reviewer Shirley N Bear Date of Review 01/08/15

Labor Standards and Contract Administration Self-Monitoring Checklist for Program Year 2014

Labor Standards and Contract Administration	Yes	No	N/A	Source/ Documentation
1. Are we paying Davis-Bacon wage rates when required?	X			Certified payroll.
2. Are we paying HUD-determined wage rates when required?	X			Contract documents.
3. Do we pay overtime at a rate of at least time and a half on contracts greater than $100,000 to which Davis-Bacon or HUD-determined wage rates apply?	X			Contract documents.
4. When we use volunteers on projects subject to Davis-Bacon and HUD-determined wage rates, do we obtain wage exemptions from HUD in accordance with 24 CFR Part 70?			X	No volunteers were used in the 2013 & 2014 calendar years.
5. Are we in compliance with HUD Handbook 1344.1 (Federal Labor Standards Compliance)	X			Contract documents.
Assessment of Labor Standards Administration				
6. Are the following documents or information maintained:				
a) Labor standards enforcement files for each construction project?	X			On site construction documents.
b) Construction start dates?	X			Certified payroll, contract.
c) Contract award dates?	X			On contract.
d) Contract bid specifications with labor standards provisions?	X			In contract file.
e) Pre-construction conference minutes? (optional)	X			In contract file.
f) Records pertaining to violations and wage restitution? (if applicable)	X			Contract file, certified payroll.
g) Apprentice/Trainee registration records (as needed)?	X			Kawerak Apprentice program, employee file.
h) Records of employee interviews?	X			Employee file, contract file.
i) Certified payrolls maintained by project?	X			Contract file.
j) Evidence of certified payroll review?	X			Contract file, employee file, payroll file.
7. Are Semi-annual Labor Standards Enforcement Reports submitted to HUD Labor Relations?	X			Contract file, HUD.

Labor Standards and Contract Administration	Yes	No	N/A	Source/ Documentation
Labor Standards Compliance, Individual Construction Contracts	X			Contract documents in the contract file.
Contract Components				
8. Are the following elements included in each contract being reviewed?	X			
a) Project number designation	X			Sequential contract file.
b) Name of contractor	X			Contract file.
c) Description of work	X			Contract file.
d) Bid opening date (/ /)	X			Contract file.
e) Contract award date (/ /)	X			Contract file.
f) Contract amount ($)	X			Contract file.
g) Start of construction date (/ /)	X			Contract file.
Contract Documents				
9. Are the following documents included in the contract file?	X			
a) Proper wage decision in contract/specifications	X			
b) Labor standards provisions in the contract/specifications	X			
c) Evidence of contractor eligibility verification	X			
d) Additional classifications and wage rates processed as needed	X			
Payroll Review				
a) Are payrolls submitted in a timely manner?	X			
b) Are payrolls signed by employer or authorized representative?	X			
c) Are discrepancies/violations noted?	X			
d) Is there evidence of payroll review?	X			Certified payroll.
e) Are discrepancies/violations followed through to full resolution?	X			
Employee Interviews				
10. Were employee interviews conducted by the recipient?	X			
11. Were a representative number of trades and workers covered?	X			

Labor Standards and Contract Administration	Yes	No	N/A	Source/ Documentation
Investigations and Enforcement				
12. Are worker complaints handled and resolved in a timely manner, and investigations conducted where appropriate?	X			Employee file, job file.
13. Are escrow accounts established and funds withheld to cover labor standards violations?	X			Contract file.
14. Are enforcement reports submitted to HUD where underpayments total $1,000 or more?	X			Employee file.
Open Findings				
15. Are there any open findings in this area identified by either HUD and/or auditor?		X		
a) If yes, summarize the finding(s):			X	
b) What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)?			X	
c) What is the current status of the finding(s) as of the date of this evaluation?			X	
d) What is tribe's/TDHE's target date for responding to HUD or auditor findings?			X	
Force Account Construction	**Yes**	**No**	**N/A**	**Source/ Documentation**
16) Do you have an adequate system of written controls over force account activities to ensure that assets are protected, used only for authorized purposes, and in accordance with program requirements?	X			BSRHA procurement policy, written inventory, inventory value & depreciation, keeping a running inventory during construction. Records held in BSRHA network storage.
17) Do you have an adequate number of qualified workers to complete the planned work?	X			Active Employee list.
18) Do you have the necessary tools and equipment to complete the project on time and within budget?	X			Power tools owned by BSRHA, hand tools supplied by employee.
19) Do you have a system to manage and maintain equipment and tools?	X			Running tool inventory before and after job.
20) Do you have qualified staff and procedures to procure materials and manage material distribution and storage?	X			Essential employees with acquisition training.
21) Does your financial system have the capacity to process and track the anticipated payroll and material expenditures?	X			Mod/Dev job costs, payroll tracking.

22) Do you have an experienced construction supervisor to supervise the construction crew(s)?	X			Qualified construction manager w/degree in cost management
23) Do you have an experienced project superintendent who can manage the project including budgets, schedules, sequencing, contract management, material management, quality control, and problem resolution?	X			Superintendent w/degree in construction management
24) Do you have clear plans and specifications which are reasonable in scope for development by force account?	X			Mod/dev records & in common drive.
25) Do you have arrangements for independent inspections to verify the quality of work and compliance with the plans and specifications?	X			Independent construction compliance inspectors.
26) Do you have arrangements for independent monitoring of progress and costs to ensure the force account construction is on track?	X			Construction superintendent.
27) Do you have an adequate budget for contingencies to address unforeseen delays, the cost of changes, and budget overruns?	X			Dictated by job cost analysis.
28) Do you have a management system to ensure compliance with labor requirements including the maintenance of records?	X			Personal files, Mod/Dev policy's & CBA.
29. Do you have a budget and plan to resolve development deficiencies including warranty problems?	X			Budgeted in IHP.
30. Do you have adequate insurance to protect you from loss and liability including workmen's compensation, property damage, builder's risk, and vehicular liability?	X			Policy, workers compensation, Amerind.

Reviewer Date of Review 1/13/2015

Environmental Review Checklist for Program Year 2014

Tribes Assuming Environmental Review Responsibilities	Yes	No	N/A	Source/ Documentation
1. Is there a separate Environmental Review Record (ERR) for each project?	X			Separate BSRHA environmental review for each village, preservation grant and for new housing in BSRHA files & computer common drive.
2. Was the current HUD-recommended (or an equivalent) format used for the ERR?	X			HUD ERR files
3. Does each ERR contain the following:	X			Current BSRHA ERR files.
a) Project description and the activities that you have determined to be part of the project, including, when applicable, geographic boundaries and all related HUD or non-HUD funded activities proposed?	X			Current BSRHA ERR files.
b) Evaluation of the effects of the project or the activities on the human environment?	X			BSRHA ERR office files on each village.
c) Documented compliance with applicable statutes and authorities, in particular those cited in §§58.5 and 58.6?	X			BSRHA ERR office files.
d) Written determinations in those cases in which the recipient claims that projects or activities are "exempt" under §58.34 or "categorically excluded" under §58.35?	X			Separate village/tribal land in BSRHA ERR office files.
e) Finding of No Significant Impact (FONSI)? (If a negative response is based on the fact that the recipient found that a significant impact may occur, please go to number 4 below to continue the review)	X			All ERR's converted to exempt status except 2014 new housing development.
f) Copy of published Notice of FONSI or a Combined Notice of FONSI and Notice of Intent to Request a Release of Funds (NOI/RROF)?	X			BSRHA common drive.
g) Copy of published of NOI/RROF or a Combined Notice of FONSI and NOI/RROF?	X			BSRHA common drive.
h) Form HUD 7015.15, Request for Release of Funds and Certification?	X			BSRHA common drive.
i) HUD 7015.16, Notice of Removal of Grant Conditions signed and dated by HUD, indicating that at least 15 days were allowed for objections?	X			BSRHA common drive.
4. Do records show that:				
a) With the exception of exempt activities, no grant funds were obligated or spent prior to the receipt of the HUD 7015.16 (or the date specified in the HUD 7015.16, if earlier)?	X			BSRHA ERR project contract files documentation on-going & finance files.

Tribes Assuming Environmental Review Responsibilities	Yes	No	N/A	Source/ Documentation
b) With the exception of categorically excluded activities determined to be exempt under the provisions of §58.34(a)(12), no physical development activities began prior to the receipt of the HUD 7015.16 (or the date specified in the HUD 7015.16, if earlier)?	X			BSRHA individual project ERR record files & computer common drive.
d) Identify the source of the information used to answer 4a and 4b.				Combination of BSRHA project and contract files and computer common drive.
Open Findings				
5. Are there any open findings in this area identified by either HUD and/or auditor?		X		All ERR finding resulted in exempt status or finding of no significant impact (FONSI)
a) If yes, summarize the finding(s):			X	
b) What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)?			X	
c) What is the current status of the finding(s) as of the date of this evaluation?			X	
d) What is the tribe's/TDHE's target date for responding to HUD or auditor findings?			X	

Reviewer Linda Lolo Jorgen Date of Review 1/8/15

Indian Housing Block Grant Recipient
Self-Monitoring And Evaluation

Tribes Declining Environmental Review Responsibilities	Yes	No	N/A	Source/ Documentation
1. Did you either supply HUD in a timely manner all available, relevant information necessary for HUD to perform for each property any environmental review required by 24 CFR Part 50 **or** prepare for an Environmental Assessment for HUD review and evaluation?			X	Our tribes do not decline environmental review responsibilities, they are done by BSRHA, and the findings presented to the tribes for review and approval.
2. (If applicable) Did you carry out mitigating measures required by HUD as a consequence of its review?			X	
3. (If applicable) Did you select an alternative property rather than carry out mitigating measures?			X	
4. Did you not acquire, rehabilitate, convert, lease, repair or construct property, nor commit local funds for these program activities with respect to any eligible property until HUD approval of the property was received?			X	
Open Findings				
5. Are there any open findings in this area identified by either HUD and/or auditor?			X	See answer#1 above.
a) If yes, summarize the finding(s):			X	
b) What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)?			X	
c) What is the current status of the finding(s) as of the date of this evaluation?			X	
d) What is the tribe's/TDHE's target date for responding to HUD or auditor findings?			X	

Reviewer Will J. Lt Date of Review 01/12/15

Audit Report Self –Monitoring Checklist for Program Year 2014

Audit Report Checklist	Yes	No	N/A	Source/ Documentation
1. Do you review expenditures from all federal funding sources at the end of your fiscal year to determine if they exceed $300,000 and require submission of an audit?	X			Newhouse & Vogler conduct an annual audit during spring.
2. When an audit is required, is the final audit report prepared within 9 months after the end of the program year?	X			
3. Do you provide necessary information to the auditor and review the audit to ensure it reports on all programs, liabilities, assets, etc.?	X			BSRHA finance files.
4. Is the audit report sent to the Federal Audit Clearinghouse and HUD within 9 months after the end of the fiscal year?	X			
5. Is the audit report sent to HUD with the APR?		X		Due dates are different for annual audit & APR.
6. Do you distribute the audit report among the Board and senior management to discuss the findings and their implications?	X			Presented to Board & Staff.
7. Do you respond to all audit findings to ensure timely resolution?	X			
8. If TDHE, was a copy of your audit submitted to Tribe?	X			All tribes receive the audit during the fall.

Reviewer 1/8/15 Date of Review

Financial Health Assessment Self-Monitoring Checklist for Program Year 2014

Financial Health Assessment Checklist	Yes	No	N/A	Source/ Documentation
General				
1. Did you calculate figures for all six indicators? **** Note for BSRHA BOC indicators are: • Timely use of funds • Current ratio (Assets/Liabilities) • Tenant Receivables Outstanding • Occupancy Loss • Management Expense Per Unit (Net Operating income)	X			2014 monthly financial submitted by Rod Hutchings to Administration & the BOC, not doing occupancy loss—Interviewed Rod Hutchings, Chief Financial Officer.
2. Do the results you calculated indicate a need to make changes in operations?		X		2014 Monthly financials.
3. If yes, have you planned changes to your operations?				From 2013 self-monitoring BSRHA has partnered with local collection agency to assist in this effort.
Timely Use of Funds				
4. Do you obligate at least 90% of your grants within two years?	X			Currently only 1 grant
5. Are you obligating and expending your oldest grants first?			X	Currently only 1 grant
6. Do you have specific activities planned appropriate to the size of your open grants?	X			All current activities are in the Indian Housing Plan
Current Ratio				
7. Do you include only current assets and current liabilities in your current ratio calculation?	X			Monthly financials
Tenant Receivable Outstanding				
8. Do you communicate to new and existing tenants the consequences of paying their rent late?	X			Late payment notice mailed to homebuyers/ NLR tenants.
9. Do you enforce your late payment policies, including eviction?	X			Currently there are several homebuyers that are going through the eviction process.
Occupancy Loss				
10. Do long delays occur between one tenant moving out and the net tenant moving in?		X		In the past there were long

				periods between homebuyers but since the management change the vacancy time has decreased dramatically. HDS vacancy report.
Management Expense Per Unit				
11. Have you excluded administrative expenses for special projects (salaries, materials) from your management expense total?	X			Monthly financials
12. Do inefficient processes contribute to a high management expense per unit?		X		Monthly financials
Net Operating Income				
13. Do you use fictitious stand-in rents, rather than real rents in your calculation?		X		Actual receivables are used.
14. Do you use the same or very similar stand-in rents for each year's calculation?	X			Actual receivables are used and indicated on the monthly and quarterly financials.

Reviewer _____ Date of Review 1/12/2015

Physical Assessment Self-Monitoring Checklist for Program Year 2014

Physical Assessment Checklist	Yes	No	N/A	Source/ Documentation
Inspection policy and procedures				
1. Is there a written policy on inspections readily available to staff?	X			G drive: MOD-DEV: Modernization Policies & Procedures.
2. Are there procedures to ensure that all units are inspected on an annual basis?	X			HDS-Unit Inspection Due/Completed Report.
3. Are there procedures to notify tenants of upcoming inspections?	X			2 week written notice letter & follow up phone calls.
4. Are there procedures to ensure that inspection results are stored and directed to the appropriate department or person for follow up (e.g., maintenance, capital planning, preventative maintenance)?	X			Hard copy in the homebuyer file & electronic copy in HDS.
Set of inspection standards				
5. Is there a set of inspection standards used to determine deficiencies during inspections?	X			BSRHA Inspection Form.
6. Do the inspection forms refer to the standards to help the inspector classify and rate deficiencies?	X			BSRHA Inspection Form.
7. Do the standards allow the inspector to highlight health and safety concerns as opposed to less urgent concerns?	X			HDS & BSRHA Inspection Form.
8. Is the inspection staff trained in the standards to help standardize results?	X			On the job training.
9. Do the inspection forms have space for inspector input regarding tenant treatment of the property?	X			BSRHA Inspection Form.
Tracking mechanism and inspection schedule				
10. Is there a mechanism for tracking and scheduling inspections for all units?	X			HDS & staff excel spreadsheet.
11. Do inspectors follow the schedule and update the tracking system after inspections?	X			In HDS.
Maintenance follow-up				
12. Do you have a written policy readily available to tenants and staff that describes maintenance actions to fix deficiencies found after inspections?	X			A&O Policy & Maintenance Policy.
13. Does your policy clearly distinguish between repairs which must be paid for by tenants and repairs which are paid for by the grantee?	X			A&O Policy & Maintenance Policy.
14. Do inspection results reach the appropriate internal departments to take follow-up actions?	X			HDS, Homebuyer files, and dept. meetings.

15. Are procedures in place to give health and safety deficiencies found during inspections high priority?	X			In HDS, health & safety deficiency levels represent a higher priority.

Reviewer Janelle Otton Date of Review 1/7/2015

Complaint Management Self-Monitoring Checklist for Program Year 2014

Complaint Management Checklist	Yes	No	N/A	Source/ Documentation
How to Reduce the Number of Complaints				
1. Do you have detailed and fair policies and procedures for your dealings with applicants, tenants, bidders, and contractors?	X			A&O policy, IHP scoring matrix, procurement policy, CBA, BSRHA personnel policy.
2. Does your staff understand and follow your policies and procedures?	X			Policies understood available, used, referenced and periodically reviewed and updated by BOC/ Management.
3. Do you have quality control systems in place (e.g., inspections, work order tracking) to make sure you deliver what you promise?	X			HDS, standard condition of unit forms, homebuyer files (paper digital).
4. Do you adequately document your decisions (e.g., evictions, eligibility, procurements)?	X			MIP, HDS homebuyer files, A&O policy personnel files.
5. Do you provide opportunities to get feedback from residents (IHP planning meetings, APR review meetings, town hall meetings with Director, surveys)?	X			GLV/WMO IHP meeting, in village IHP meetings, Construction scoring matrix.
The Complaint Management Process				
6. Are there easy ways for tenants to place complaints?	X			Complaints can be filed online, via mail/fax/phone or in person. Letters kept in homebuyer files, calls logged in HDS. Procedures outlined in A&O, CBA & personnel policy.
7. Do you use a standard form to track complaints that includes information on response time and actions taken?	X			Per policy complaint form on website & HDS track complaints w/ work orders. Management instituting performance matrices to ensure all staff

				are producing and tracking performance.
8. Is there a clear workflow (e.g., a complaint designee in each department) and target timeframes for following up on complaints?	X			Complaints presented to Director of Operations & delegated to each department. Timeline directive given with delegation of tasks as needed.
9. Do you store completed complaint forms and analyze them for patterns?	X			VP/Director of Operations keeps a log of all complaints (resolved & unresolved) also copies kept in each HB file.
10. Has your staff been trained in the basics of customer service for listening and responding to complaints?	X			On the job training. VP/Director of Operations to be implementing a recurring customer service refresher on an annual basis.

Reviewer Matthew Mudek Date of Review 1/07/15