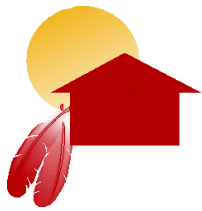
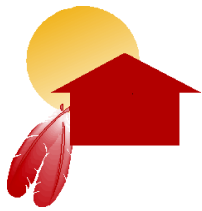


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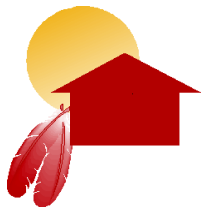
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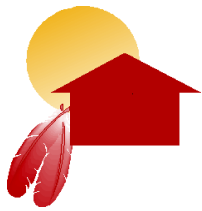
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<b>I. Purpose</b>				
<p>IHBG recipients are required to complete an annual self-monitoring compliance assessment (Assessment) of adherence to IHBG program requirements and applicable statutes. Self-monitoring activates the tribal self-determination framework envisioned under NAHASDA. Beneficiaries and recipients of assistance are expected to be accountable for their stewardship of NAHASDA resources. An Assessment system assists IHBG recipients to identify weak management practices that may lead to later consequences that could lessen the ability of the organization to provide affordable housing. Self-monitoring builds organizational capacity by learning from mistakes and successes to improve the way housing activities and programs operate.</p> <p>The following questions should assist the reviewer in evaluating the recipient's Assessment process.</p>	<p>NAHASDA, Section 403(b)</p> <p>2 CFR 200.328(a)</p> <p>24 CFR 1000.502(a) and (b)</p>	<p>Program Guidance 2007-08 and 2005-04, (Tribes/ TDHEs)</p> <p>HUD-52737 (IHP/APR)</p>		
<b>II. Pre-Visit Preparation</b>				
<p>A. If ONAP has entered into a Self-Monitoring Mutual Agreement (SMMA) with the recipient, review the SMMA, as well as:</p>	<p>24 CFR 1000.503(d)</p>			
<p>1. The self-monitoring plan or policy or revised plan or policy.</p>				



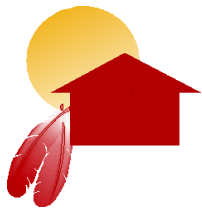
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2. The latest Assessment conducted and submitted by the recipient and the results.				
3. The actions proposed or taken to correct any deficiencies noted in the Assessment.				
<p>B. If available, review the following documents:</p> <ol style="list-style-type: none"> <li>1. Most recent IHP, approved IHP amendments, IHP amendments in process</li> <li>2. Section 10 of latest APR. Based on any deficiencies identified in Section 10, identify areas for additional attention during site review.</li> <li>3. Previous monitoring findings in the areas of procurement, Indian preference, contract administration, and/or Section 3.</li> <li>4. Financial audits and OIG audits findings and/or work papers in the areas of procurement, Indian preference, contract administration, and/or Section 3.</li> <li>5. Corrective actions status for findings in any of these areas.</li> <li>6. Previous and current enforcement actions.</li> <li>7. Valid complaints received in the areas of procurement, occupancy, Indian preference, contract administration, and/or Section 3.</li> <li>9. Relevant correspondence</li> </ol>				



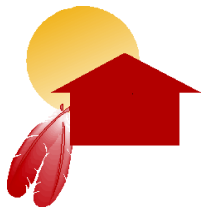
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<b>III. On-Site Review</b>				
<p>Under NAHASDA, both the recipient and the grant beneficiary have a role in reviewing the activities conducted and housing assisted to assess compliance with the requirements of NAHASDA. The sections below review each entity's role.</p> <p>Review the sampling methods in the General Instructions.</p>	<p>NAHASDA, Section 403(b)</p> <p>24 CFR 1000.502(a) and (b)</p> <p>24 CFR 1000.503(b) and (c)</p>	<p>Program Guidance 2007-08 and 2005-04, (Tribes/ TDHEs)</p>		
<b>IV. Recipient Responsibilities (TDHE or Tribe)</b>				
<p>A. If the recipient has a Self-Monitoring Policy, the reviewer should review the policy to assist in determining whether the recipient's plan or process has been followed.</p>	<p>NAHASDA, Section 403(b)</p>			
<p>1. Is a self-monitoring plan or process in place?</p>				
<p>2. Does the self-monitoring plan indicate there could be a conflict of interest in regard to the person conducting the Assessment?</p>				



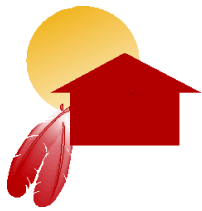
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3. Review the recipient's Assessments.				
4. Are Assessments completed at least annually?	24 CFR 1000.502(a) and (b)			
5. Are the Assessments adequate?	24 CFR 1000.502(b) and .506			
a Is the recipient providing regular Assessment reports to the BOC or Tribal officials?				
b. Does the Assessments process include an analysis of the planned activities identified in the IHP?				
c If so, does the Assessment provide information concerning the status of the planned activities?				
B. Has the recipient noted any deficiencies or areas of noncompliance with NAHASDA and other applicable regulations?				
1. If so, does the recipient have an adequate corrective action plan or strategy in place to address those deficiencies or violations?	24 CFR 1000.508			



<b>RECIPIENT NAME:</b>	<b><u>Regulatory/ Statutory Citation</u></b>	<b><u>Other Tools</u></b>	<b><u>W/P Pg.</u></b>	<b><u>Remarks</u></b>
2. If deficiencies are identified in the Annual Performance Report (APR) with corrective actions, test on site to confirm the statements.	24 CFR 1000.512	HUD-52737 (IHP/APR)		
3. Test for completion and effectiveness of corrective actions.				
<p>C. Has HUD’s on-site monitoring review identified deficiencies or areas of noncompliance that were not identified in the recipient’s Assessments?</p> <p>If yes, the reviewer should make an additional finding or concern in this area citing that its Assessments process is not adequate to ensure compliance with applicable Federal requirements.</p> <p>If no Assessment deficiencies are identified, go to question 2.</p>	24 CFR 1000.508			
<p>1. Has the recipient made progress from year to year in addressing deficiencies identified in the Assessments?</p> <p>NOTE. The most efficient way to determine progress over time is to design an exception chart, identifying by year, the problem, and corrective actions determined</p>				

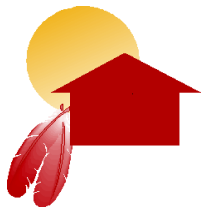


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and taken. Progress over time should result in fewer problems each year.				
2. Has the recipient made the results of its Assessment available to the public? (Determine this from either the APR or from management and staff interviews.)	24 CFR 1000.518	Section 10 of the IHP/APR		
<b>V. Recipient Responsibilities If TDHE Is Recipient</b>				
Has the TDHE submitted periodic progress reports to the Tribe, including the Assessment, APR, and audit reports? Note: This may have to be determined when reviewing the tribe to ensure the TDHE has met its responsibilities.	24 CFR 1000.502(b) and .506			
<b>VI. Tribe Responsibilities If TDHE is Recipient</b>				
When the recipient is a TDHE, the tribe is responsible for monitoring programmatic and compliance requirements by requiring the TDHE to prepare periodic progress reports including the Assessment, APR, and audit reports.				
A. Has the tribe established a schedule for the TDHE to submit Assessment reports and has the tribe provided the schedule to the TDHE?	24 CFR 1000.502(b)			

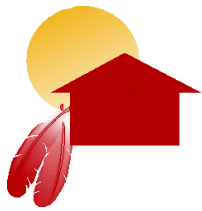


<b>RECIPIENT NAME:</b>	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>W/P Pg.</u>	<u>Remarks</u>
B. If yes, is the TDHE submitting the Assessment reports to the Tribe according to the schedule established?	24 CFR 1000.506			
C. Has the Tribe monitored the TDHE to determine whether the TDHE is meeting the programmatic and compliance requirements of the IHP and NAHASDA?	24 CFR 1000.506			
1. If yes, has the Tribe identified any compliance concerns?	24 CFR 1000.510			
2. If yes, has the TDHE addressed these concerns?	24 CFR 1000.510			
3. If no, include the finding in the monitoring report to the TDHE and send a letter to the Tribe notifying them of the finding.				
<b>VII. Subrecipients</b>				
A. Are subrecipients contractually involved in the recipient's IHBG activities?	2 CFR 200.330 and .331			
1. If so, is the recipient monitoring the subrecipients for compliance with the subrecipient agreement and applicable NAHASDA requirements?	2 CFR 200.331			

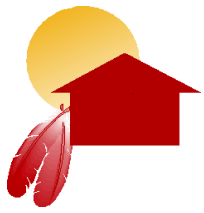




<b>RECIPIENT NAME:</b>	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>W/P Pg.</u>	<u>Remarks</u>
2. Use the above questions to evaluate the recipient’s monitoring of its subrecipients – this may cover area(s) that ideally should have been included in a contract and were not.				
B. Are subrecipients included in the Assessments process?				
<b>VIII. Self-Monitoring Mutual Agreements</b>				
A. Has ONAP entered into a SMMA with the recipient? If so,	24 CFR 1000.503(d)			
1. Has the self-monitoring plan and/or policy been revised since the SMMA was executed?				
a. If so, does it still address all the items contained in the Program Guidance under the “Initial Review” section?				
b. If not, the SMMA should be reviewed and possibly terminated.				
2. Was the Assessment conducted by an independent person.				
3. If corrective actions were identified in the last Assessment, have they been taken?				



<b>RECIPIENT NAME:</b>	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>W/P Pg.</u>	<u>Remarks</u>
4. If so, have the deficiencies been corrected?				
5. Has the reviewer identified any findings that were not identified in the recipient's last Assessments?				
a. If the violation(s) occurred after the last Assessment, make additional finding(s) in this area.				
b. If the violation(s) occurred prior to the last Assessment, make additional finding(s) <u>and</u> contact the Area ONAP to terminate the SMMA.				
<b>X. Summary</b>				
<ul style="list-style-type: none"> <li>A. Summarize the results of the review in a work paper.</li> <li>B. Discuss significant issues with Supervisor.</li> <li>C. Develop findings, including questioned costs and corrective actions, as appropriate.</li> <li>D. Develop concerns because they could lead to a violation</li> <li>E. Develop report language, including any findings and concerns.</li> <li>F. If there are any major issues identified in this review and the recipient has approval to invest, determine if a withdrawal of investment authority should be recommended.</li> </ul>				



<b>Reviewer Name:</b>	
<b>Review Date(s):</b>	

Attach supporting documents to back of this page.