

Adoption of A Self Monitoring Policy

WHEREAS, pursuant to the authority vested in the Coeur d'Alene Tribe by the Constitution and its authority to provide for the health, welfare and safety of the Tribe and its members and others who live on the Coeur d'Alene Reservation, in order to address the critical shortage of housing for members of the Coeur d'Alene Tribe, the Tribal Council of the Coeur d'Alene Tribe organized the Coeur d'Alene Housing Authority pursuant to the Tribal Council Ordinance CDA 205(1963) and designated as the Tribally Designated Housing Entity (TDHE) by Resolution No. 98(1998) dated March 30, 1998; and

WHEREAS, the Native American Housing and Self-Determination Act of 1996 (NAHASDA), assists and promotes affordable housing activities to develop, maintain, and operate housing in a safe and healthy environment on Indian reservations and in other Indian Areas for occupancy by low-income families;

WHEREAS, recipients of NAHASDA Indian Housing Block Grant (IHBG) funds are responsible for monitoring grant activities, ensuring compliance with applicable federal requirements, and monitoring performance goals under the Indian Housing Plan (IHP);

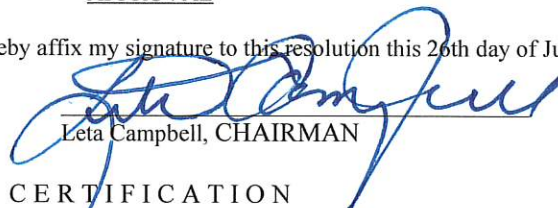
WHEREAS, NAHASDA §403(b) requires IHBG recipients to prepare a compliance assessment at least annually;

WHEREAS, the Coeur d'Alene Tribal Housing Authority received IHBG funds for the current program year to support the affordable housing goals and objectives of its IHP;

NOW THEREFORE BE IT RESOLVED that the Coeur d'Alene Housing Authority acknowledges it is required to conduct an annual assessment of its adherence to NAHASDA's applicable federal requirements through a self-monitoring process; that the self-monitoring process will be conducted by an impartial reviewer; that results of this assessment will be made accessible to the public; and that recommendations to improve areas of significant compliance deficiencies will be developed and implemented during the proceeding program year.

APPROVAL

I, the Chairman of the Board, do hereby affix my signature to this resolution this 26th day of June, 2018.


Leta Campbell, CHAIRMAN

CERTIFICATION

I hereby certify that the foregoing resolution was duly considered by the CDTHA Housing Board of Commissioners at a properly called meeting on May 22nd, 2018, at which a quorum was present and the board agreed to an email vote, the email vote of 3 in favor, 0 opposed, and 2 abstaining, and that said resolution has not been rescinded or amended in any way.
Dated this 26th day of June, 2018.


Treva Callahan, Secretary

Coeur d'Alene Tribal Housing Authority

SELF – MONITORING POLICY

These policies and procedures were adopted by the governing body of the Coeur d'Alene Tribal Housing Authority by Resolution #2018-03 on June 26, 2018.

SECTION 1

POLICY STATEMENT

The governing body of the Coeur d'Alene Tribal Housing Authority recognizes the fact that they are responsible for establishing a self-monitoring policy and conducting compliance assessments as required by Section 403 of the Native American Housing and Self-Determination Act of 1996 (NAHASDA) and 24CFR 1000 Subpart F entitled 'Recipient Monitoring Oversight, and Accountability'. This policy is to be utilized by Coeur d'Alene Tribal Housing Authority staff to monitor and assess the activities of Coeur d'Alene Tribal Housing Authority to ensure compliance with applicable Federal requirements and monitoring performance goals described in the Coeur d'Alene Tribal Housing Authority's Indian Housing Plan (IHP).

As the NAHASDA beneficiary, the Coeur d'Alene Tribe is responsible for monitoring programmatic and compliance requirements of the IHP and NAHASDA. Therefore, the Coeur d'Alene Tribal Housing Authority will submit to the Coeur d'Alene Tribe the annual assessment, the Annual Performance Report (APR), and a copy of the fiscal audit conducted.

This policy is intended to establish an easy to use compliance assessment system that includes self-monitoring procedures to be used by the Coeur d'Alene Tribal Housing Authority as a management tool in operating as a property management business.

SECTION 2

CONDUCTING COMPLIANCE ASSESSMENTS

- 2.1. Approaches.** The Executive Director shall determine each year what approach to take in conducting self-monitoring compliance assessments in accordance with this policy. The Executive Director shall assure that the assessments are conducted with an objective and impartial perspective and that no one is reviewing their own work.
- 2.2. Methods.** The Executive Director shall determine the most effective method, or combination of methods, to utilize in conducting the self-monitoring compliance assessments in accordance with this policy. Conducting the compliance assessments may be achieved through the following methods:
- A. Interviews with managers and/or program administrators.** The assessor shall complete the self-monitoring checklists that are included as an appendix to this policy by conducting one-on-one interviews with the respective managers or administrative personnel to obtain their insights into how they adhere to specific compliance questions. The assessor shall gather a sufficient amount of corroborating information to exercise his/her judgment in determining the consistency and degree of adherence to the applicable regulatory requirements.
 - B. Facilitated sessions.** An independent third-party shall act as a facilitator and conduct self-assessment workshops with the managers and administrative staff to talk through the monitoring checklist questions as a group. The role of the facilitator shall be to lead the group's discussion and bring the group to consensus on the appropriate response to compliance questions.
 - C. Standard Operating Procedures Review.** The assessor shall review the Coeur d'Alene Tribal Housing Authority's standard operating procedures including all of the policies and governing documents required by NAHASDA, as well as, the Coeur d'Alene Tribal Housing Authority's contracts and established internal controls. The assessor shall analyze how well the staff adheres to the adopted policies and procedures. The assessor shall also select a random sample of transaction files and determine whether the documentation included and recorded in the files conform with established operating procedures. The assessor shall compile and analyze the information and answer the compliance questions on the checklist.

SECTION 3

CONDUCTING COMPLIANCE ASSESSMENTS

3.1. Monitoring Strategy and Plan

- A. The Coeur d'Alene Tribal Housing Authority's Executive Director shall develop and complete a Monitoring Plan each plan year, encompassing the following items:
- (1) The self-monitoring compliance assessments start and completion dates.
 - (2) Approach to take to conduct and complete the different compliance assessments as described in Section 2.1.A.
 - (3) Frequency of conducting and completing the compliance assessments (annually, semi-annually, quarterly)
 - (4) Procedures to resolve any identified deficiencies or concerns

3.2. Areas to be Monitored for Compliance

A. List of areas

- (1) APR Development & IHP Monitoring
- (2) Organizational Control Environment
- (3) Resident Eligibility & Service Standards
- (4) Fiscal & Financial Management
- (5) Procurement & Contract Administration
- (6) Labor Standards & Construction Management
- (7) Environmental Review

- B. Additions to List.** The Executive Director may add any additional areas to the list as recommended by the governing body or any HUD notices, guidance's, or guidebooks.

3.3. Resolution of Noncompliance Areas and Issues

A. Recommendations

- (1) If deficiencies are discovered during the assessments performed in accordance with these procedures, the Executive Director will establish a Recommendations for Improvement Plan with target dates and corrective actions to ensure resolution and to prevent the recurrence of the deficiencies.
- (2) The Recommendations for Improvement Plan will be submitted to the Coeur d' Alene Tribal Housing Authority Board of Commissioners within 30 days of completion of the assessments.

- B. Oversight responsibility.** The Executive Director will be responsible for providing oversight to ensure that all deficiencies are corrected and for concurring on the closure of each identified deficiency.

3.4. Reporting

The Coeur d'Alene Tribal Housing Authority's self-monitoring compliance assessment activities conducted in accordance with this policy shall be summarized in a report and presented to the Coeur d'Alene Tribe.

The self-monitoring compliance checklist is not required to be submitted with the APR; however, a summary of the self-monitoring activities should be included, along with the appropriate required responses on the APR form to demonstrate that the Coeur d'Alene Tribal Housing Authority is in compliance with 24CFR § 1000.502.