




---

---

---

---

---

---

---

---




---

---

---

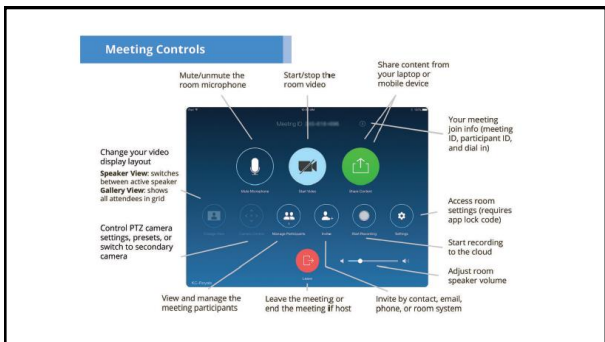
---

---

---

---

---




---

---

---

---

---

---

---

---




---

---

---

---

---

---

---

---




---

---

---

---

---

---

---

---

**Poll: I work as a . . .**

- A. Executive Director
- B. Board or Tribal Council Member
- C. Occupancy
- D. Housing Counselor
- E. Maintenance/Construction
- F. Housing Manager
- G. Finance
- H. Consultant
- I. ONAP Rep
- J. I am not sure what my job is

---

---

---

---

---

---

---

---

HOW LONG  
HAVE YOU BEEN  
WORKING IN  
HOUSING?

- Zero to 6 months
- 7 to 12 months
- 1 to 3 years
- 4 to 5 years
- 6 to 10 years
- 10 years +

---

---

---

---

---

---

---

---

Poll: I want  
to learn  
about \_\_\_\_\_.  
Select all that  
apply

- A. NAHASDA Requirements
- B. Writing Tips for Policy Writing
- C. Policy Regarding Essential Families
- D. Policy for Lease Purchase Program
- E. Qualifying for a homebuyer program
- F. I don't know.

---

---

---

---

---

---

---

---

POLLING

• I HAVE THE  
FOLLOWING POLICIES  
IN PLACE.

	YES	NO		
1. ADMISSIONS & OCCUPANCY				
2. INDIAN PREFERENCE				
3. LEASE PURCHASE POLICY				
4. COVID-19 POLICY				
5. REHAB POLICY				

---

---

---

---

---

---

---

---

**POLLING**

- I NEED TO UPDATE THE FOLLOWING POLICIES

1. ADMISSIONS & OCCUPANCY	INDIAN	YES	NO		
2. PREFERENCE					
3. LEASE PURCHASE POLICY					
4. COVID-19 POLICY					
5. REHAB POLICY					

---

---

---

---

---

---

---

---



---

---

---

---

---

---

---

---

**NAHASDA POLICY REQUIREMENTS**

---

---

---

---

---

---

---

---

**WHICH POLICIES ARE REQUIRED BY NAHASDA?**

RECERTIFICATION		RECIPIENT
SELECTION	NAHASDA	
GRIEVANCE		RECIPIENT
MAINTENANCE	NAHASDA	RECIPIENT
COLLECTIONS		RECIPIENT
ADMISSIONS	NAHASDA	
CALCULATION OF HOUSE PAYMENTS	NAHASDA	
CRIMINAL BACKGROUND CHECK		RECIPIENT
PROCUREMENT	NAHASDA	
TRAVEL		RECIPIENT
WRITTEN WAITING LIST	NAHASDA	

---

---

---

---

---

---

---

---

---

---

### Developing Policies and Procedures

- Policies and procedures are based on two fundamental premises:
  - Tribes/TDHE's exist to make the world operate differently than it would if they did not exist.
  - It takes a good working knowledge of tribal/TDHE housing programs and the people being served along with practice and critiquing by others for a person to become an effective policy writer.

---

---

---

---

---

---

---

---

---

---

### Another Understanding of How Policies and Procedures Work?

**Official Policy:** A written statement of program direction and intent that is adopted by majority vote of each tribe's/TDHE's governing body and appears in the governing body's official minutes.

**Actual Policy:** program direction as actually practiced.

**Effective Policy:** one that works.

**Effective Procedures:** a set of specific, detailed and sequential steps that, when followed, cause the governing body's desired policy consequences to occur.

---

---

---

---

---

---

---

---

---

---

## Purpose of Policies:

19

Ensure	Ensure that all housing staff do things the same way, thus promoting consistency and fairness while also minimizing the potential for disputes or legal actions
Provide	Provide a foundation for sound management and supervision
Provide	Provide a basis for auditor justification
Ensure	Ensure transparency

---

---

---

---

---

---

---

---

## Does NAHASDA Serve Only Indians?

To provide Federal assistance for Indian tribes in a manner that recognizes the right of tribal self-governance, and for other purposes.

The need for affordable homes in safe and healthy environments on Indian reservations, in Indian communities, and in Native Alaskan villages is acute and the Federal Government shall work not only to provide housing assistance, but also, to the extent practicable, to assist in the development of private housing finance mechanisms on Indian lands to achieve the goals of economic self-sufficiency and self-determination for tribes and their members;

**FEDERALLY RECOGNIZED TRIBE:** The term 'federally recognized tribe' means any Indian tribe, band, nation, or other organized group or community of Indians, including any Alaska Native village or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act, that is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians pursuant to the Indian Self-Determination and Education Assistance Act of 1975.

---

---

---

---

---

---

---

---

## What are the Objectives of NAHASDA?

Assist and promote affordable housing

Better access to mortgage markets

Promote self-sufficiency

Plan and integrate infrastructure

To promote the private capital markets

---

---

---

---

---

---

---

---

### NAHASDA-Required Policies

NAHASDA mentions the word "policy" 27 times

- NAHASDA requires that certain policies be adopted.

RENT

CONFLICT OF INTEREST

ADMISSIONS

INSURANCE

SELECTION

---

---

---

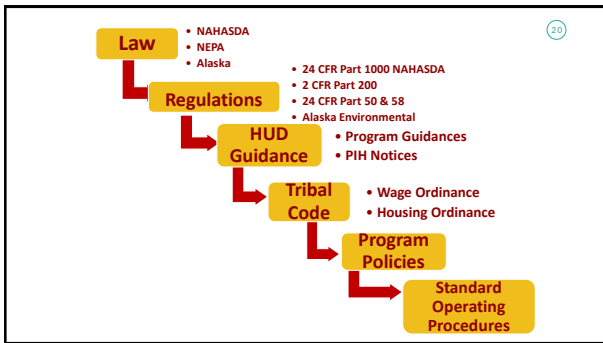
---

---

---

---

---




---

---

---

---


---

---

---

---

### Public Law 93-638



- The Indian Self-Determination and Education Assistance Act (ISDEAA) in 1975, delegated authority to Indian tribes to provide their own services created by the federal trust responsibility.
- The Act defined the term "Indian tribe" to include "any Alaska Native village or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act [43 U.S.C.A. §§ 1601 et seq.] which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians." As of 1993, only applies to Alaska tribes.

---

---

---

---

---

---

---

---

### NAHASDA Statutory Sections

22

- ❖ Title I: Block Grants and Grant Requirements
- ❖ Title II: Affordable Housing Activities
- ❖ Title III: Allocation of Grant Amounts
- ❖ Title IV: Compliance Audits and Reports
- ❖ Title V: Termination of Assistance
- ❖ Title VI: Federal Guarantees for Financing
- ❖ Title VII: Other Housing Assistance

---

---

---

---

---

---

---

---

### Key Regulations

\$1000.10 - Definitions	\$1000.101 - Affordable housing
\$1000.12 - Nondiscrimination	\$1000.102 - Eligible affordable housing activities
\$1000.14 - Relocation & real property acquisition	\$1000.103 - Tenant/project-based rental assistance
\$1000.18 - Environmental review requirements	\$1000.104 - Eligible families
\$1000.26 - Administrative requirements	\$1000.106-108 - Families requiring HUD approval
\$1000.30-34 - Conflict of interest	\$1000.110 - Conditions for non-low-income Indian families participation
\$1000.36 - Records retention	\$1000.120 - Tribal Indian preference or tribal preference in selecting families for housing

---

---

---

---






---

---

---

---

### What Other Laws, Regulations Impact Our Policies

-  Uniform Administrative Requirements 2 CFR Part 200
-  Alaska Uniform Residential Landlord and Tenant Act
-  American Disabilities Act
-  Generally Accepted Accounting Principals
-  Uniform Relocation Act

---

---

---

---

---


---

---

---



## Uniform Administrative Requirements 2 CFR Part 200



- ◆ Management systems
  - ◆ Written policies
  - ◆ Written procedures
- ◆ Insurance
- ◆ Drug-Free Workplace
- ◆ Procurement
- ◆ Reporting & recordkeeping
- ◆ Conflict of interest
- ◆ Audit
- ◆ Allowable, unallowable costs

---

---

---

---

---

---

---

---

## Compliance Criteria

- Admissions and Occupancy (24 CFR §§1000.104-.110, 1000.120, 1000.124-.156, NAHASDA Sec. 203(a)(1))
- Management/Personnel (2 CFR Part 200)
- Maintenance (NAHASDA Sec. 203 (b) and 203 (e))
- Travel (2 CFR §200.474)
- Procurement (2 CFR §§200.317-326, 24 CFR §1000.26)
- Real Property Acquisition (24 CFR §1000.14, 49 CFR Part 24)
- Relocation (24 CFR §1000.14, 49 CFR Part 24)
- Conflict of interest (24 CFR §§1000.30-36) (2 CFR Part 200.318)

---

---

---

---

---

---

---

---

## Compliance Criteria

- ◆ Indian Preference (24 CFR §§1000.48-.54)
- ◆ Labor standards (24 CFR §§1000.16)
- ◆ Environmental clearance (24 CFR §§1000.18-.24, 24 CFR Part 58)
- ◆ Lead based paint (24 CFR §1000.40, Section 302 of the Lead based Paint Poisoning Prevention Act)
- ◆ Accessibility (24 CFR §1000.12, 24 CFR Part 8, Section 504 of the Rehabilitation Act of 1973)
- ◆ Flood Insurance (24 CFR §1000.38)

---

---

---

---

---

---

---

---

# PIH NOTICES AND NAHASDA GUIDANCE

- ▣ PIH Notices
- ▣ Program Guidance
- ▣ Sources:
  - ▣ <https://www.hud.gov/co> detalk and click on either "PIH Notices" or "Program Guidance"

---

---

---

---

---


---

---

---

# NAHASDA Policy Concerns

IDENTIFY POLICIES YOU WILL NEED TO CREATE



USE THE WHITEBOARD

---

---

---

---

---

---

---

---

GOVERNING DOCUMENTS	REQUIRED BY	CURRENT STATUS	COMMENTS
Tribal Codebook (including the TA)	1937 Housing Act	Ordinance adopted by Res. # on	
HA (designated as TORE by state for HUD)	NAHASDA	Tribal Res. # adopted on	
	1937 Housing Act	Adopted by Res. # on	
<b>POLICY</b>			
Rent & Rental Payment	NAHASDA 203(a)(1)	Included in the E, A & D Policy	
Eligibility, Admissions & Occupancy	NAHASDA 203(a)	Adopted by Res. # on	
Residence	NAHASDA 203(b)	Adopted by Res. # on	
Yield & Homebuyer Selection	NAHASDA 207(b)	Included in the E, A & D Policy	
Procurement	24CFR 100.26 & 2CFR 200	Adopted by Res. # on	
Indian Preference	24CFR 100.52	Included in the Procurement Policy	
Control of Interest	24CFR 1000.30 & 2CFR 200	Included in the Procurement Policy	
Open File Workbooks	24CFR 1000.46 & 24 CFR Part 21	Adopted by Res. # on	
Cash Management	24CFR 1000.26 & 2CFR 200	Adopted by Res. # on	
HUD Section 3	24CFR 1000.42	Included in the Procurement Policy	
Investment & Internal Control	PIH Notice 2015-08	Adopted by Res. # on	
Self-Monitoring & Evaluation	24CFR 1000.5rd	Adopted by Res. # on	
Real Property acquisition & relocation	24 CFR 1000.14	Adopted by Res. # on	
Lease with Option to Purchase			
Housing Counseling			
<b>OTHER POLICIES</b>			
Site/visitation (Adopted or Recommended)		Adopted by Res. # on	
Travel (Adopted or Recommended)		Adopted by Res. # on	
Personnel (Adopted or Recommended)		Adopted by Res. # on	
Collection (Adopted or Recommended)		Adopted by Res. # on	
Housing Quality Standards		Adopted by Res. # on	
Code of Conduct		Adopted by Res. # on	
Integrity		Adopted by Res. # on	
Disposition		Adopted by Res. # on	
Investment		Adopted by Res. # on	
Vehicle Use		Adopted by Res. # on	

---

---

---

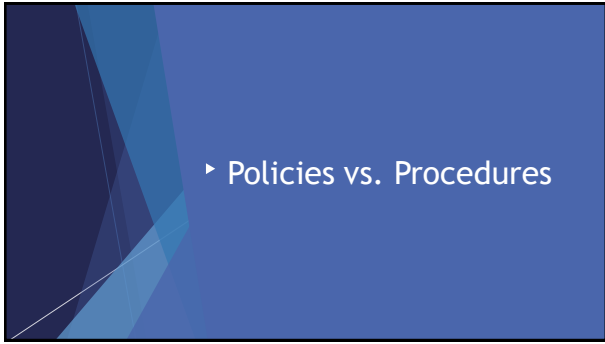
---

---

---

---

---



---

---

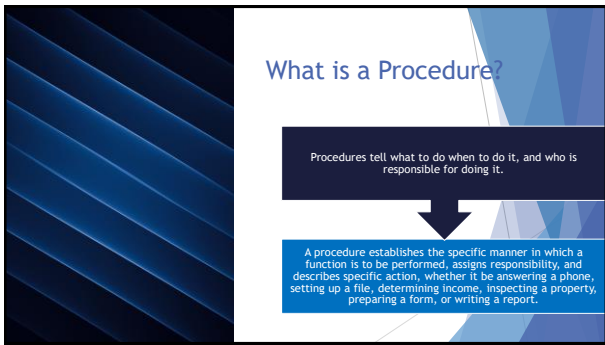
---

---

---

---

---



---

---

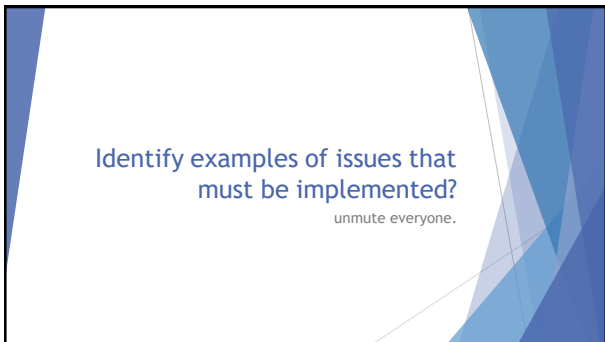
---

---

---

---

---



---

---

---

---

---

---

---

## Why are Procedures Necessary?

A good set of written procedures increases the likelihood that programs will be:

- ▶ Administered properly;
- ▶ Delivered in a way that staff know their responsibilities;
- ▶ Implemented in a manner that ensures performance objectives are met according to the established policies;
- ▶ Consistently delivered;
- ▶ Understood and trusted by the public;
- ▶ Delivered efficiently, with as many households served as possible;
- ▶ More easily delivered by new staff with little interruption to workflow; and
- ▶ Understood and accurately described by staff, members of the board and/or tribal council.

---

---

---

---

---

---

---

---

---

---

## Policies and Procedures Compared

- Policies
  - ▶ Set of principles, rules, and guidelines formulated by an organization
- Procedures
  - ▶ Series of steps followed in a regular definite order

Policies	Procedures
Have widespread application	Have a narrower focus
Are non-negotiable, change infrequently	Are subject to change and continuous improvement
Are expressed in broad terms	Are a more detailed description of activities
Are statements of what and/or why	Are statements of how, when and/or who & sometimes what
Answer major operational issues	Detail a process

---

---

---

---

---

---


---

---

---


---

## Policy or Procedure?



**Admission and Occupancy Policy Application Process**

**Policy:** "Families must submit a completed application before they can be determined eligible for placement on a waiting list."  
**Procedure:** "Upon receiving a completed application, the Clerk must set up a file."



**Policy:** "No low-income family will be charged more than 30% of adjusted gross income."  
**Procedures:** "Calculate anticipated annual gross income; subtract permitted allowances/ deductions; divide by 12 months; multiply by percentage of income being charged by program percentage."

---

---

---

---

---

---

---

---

---

---

### Policy or Procedure

"Fair market rents for the area as published by HUD annually will be used by the Recipient as the ceiling rents for low-rent units."

"Move-Out inspections must be conducted by the staff within 48 hours."

"The tenant will be notified by staff that there might be charges for repairs, which will be added to the new unit bill as additional rent."

"Recipient requires the completion of a move-in inspection prior to the signing of a lease agreement and tenant occupancy."

---

---

---

---

---

---

---

---

### Poll

❖ What is the primary difference between policies and procedures?

- A. Nothing
- B. Policies are guiding principles, procedures are a series of steps
- C. Policies are localized, procedures are universal
- D. Policies are easily changed; procedures require approval from a governing body
- E. Policies are specific, procedures are generalized

**B. Policies are guiding principles; procedures are a series of steps.**

---

---

---

---

---

---

---

---

### ACTIVITY: Policy or Procedure

A.	POLIC Y	B.	PROCEDUR E	"Fair market rents for the area as published by HUD annually will be used by the Recipient as the ceiling rents for low-rent units."
A.	POLIC Y	B.	PROCEDUR E	"Usually we use two people to conduct a Move-In inspection."
A.	POLIC Y	B.	PROCEDUR E	"The tenant will be notified by staff that there might be charges for repairs, which will be added to the new unit bill as additional rent."
A.	POLIC Y	B.	PROCEDUR E	"Green file labels will be typed by the receptionist and affixed to the file folder."

---

---

---

---

---

---

---

---

## PROJECTS VS PROGRAM

---

---

---

---

---

---

---

---

### What is a Project?

- A project is “a temporary endeavor undertaken to create a unique product, service, or result”\*
- Operations is work done to sustain the business
- Projects end when their objectives have been reached, or the project has been terminated

\*Project Management Institute, Inc., A Guide to the Project Management Body of Knowledge (PMBOK® Guide, Fifth Edition) (2012).

---

---

---

---

---

---

---

---

### Project Examples

- Rehabilitation of 60 owner-occupied units in need of major energy improvements;
- Construction of a rental housing subdivision;
- Construct a community center
- Identify a site to construct a 20-unit low-income senior citizen facility



---

---

---

---

---

---

---

---

### What is a Program?

A program is:

- “A group of related projects managed in a coordinated way to obtain benefits and control not available from managing them individually”\*
- A **program manager** provides leadership and direction for the project managers heading the projects within the program

\*Project Management Institute, Inc., A Guide to the Project Management Body of Knowledge (PMBOK® Guide, Fifth Edition) (2012)

---

---

---

---

---

---

---

---




---

---

---

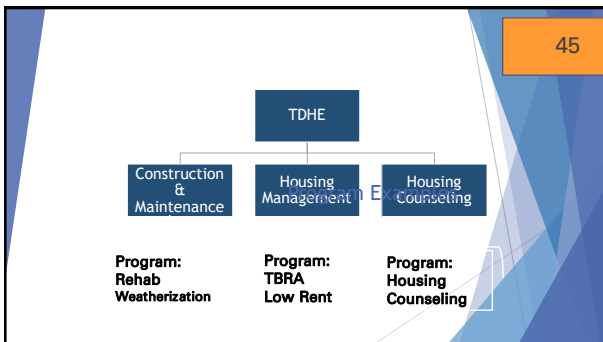
---

---

---

---

---




---

---

---

---

---

---

---

---

## Description of Program

- A Recipient created Lease With Option to Purchase (LWOP) Program to assist tribal members and Alaska Natives who may not be ready to meet qualification requirements for a mortgage loan from a private lender.
- The Recipient will own the property and rent to a homebuyer family for a specified rental period, at the end of which, the renter has an exclusive option to purchase the property.

---

---

---

---

---

---

---

---

## Description of Program: Goals

**1**

Promote affordable rent to own opportunities for those low- and moderate-income enrolled members who need assistance in qualifying for mortgage financing.

**2**

Provide opportunities for low- and moderate-income enrolled members to better access the private mortgage market for homeownership on The Recipient property.

**3**

Facilitate self-sufficiency of tribal members.

---

---

---

---

---

---


---

---

## Description of Program

Eligibility: Program Specific Criteria

- Have sufficient, stable income required to meet the minimum rent and the other financial obligations of maintaining and buying a home;
- Be able to overcome the obstacles to mortgage readiness in a period of time not to exceed 36 months;
- Be committed to schedule the time to participate in the required group counseling and one-on-one counseling tailored to the individual family's needs;
- Participants entering this program must remember that this is not a substitute low-rent program. Additionally, failure to exercise the option or to comply with any of the other terms and conditions of the program will result in termination of participation, termination of homebuyer family LWOP Agreement, and loss of the exclusive option to purchase.




---

---

---

---

---

---

---

---



## Description of Program

### Eligibility Continued

- All applicants must be able to pay the minimum rent and achieve mortgage readiness according to their Client Action Plan but not to exceed three (3) years. Homebuyers must
- Be committed to purchasing the leasehold property.
- Have sufficient income required to meet the minimum rent and the other financial obligations of maintaining and buying a home.
- Be able to overcome the obstacles to mortgage readiness in a period of time not to exceed 36 months except in extreme circumstances.
- Be committed to schedule the time to participate in the required group counseling and the one-on-one counseling tailored to the individual family's needs.

---

---

---

---

---

---

---

---

## Description of Program

- ❖ Eligibility Continued
- ❖ House payments made under the LWOP Agreement will be applied to the purchase of the home to cover debt service when the option is exercised.

---

---

---

---

---

---

---

---

## WHOSE REQUIREMENTS

51

- Set income limits.
- Charge moderate-income family more than 30% adjusted income.
- Require a credit check for admission.
- Establish priorities in selection.
- Indian preference in tenant selection.
- Implement criminal background check
- Charge low-income family less than 30% adjusted income.
- Recertify every six months
- Give a utility allowance.
- Establish policies for management and operations.
- Non-low-income families must have a need that cannot be met without IHG assistance.

NAHASDA	
NAHASDA	
	RECIPIENT
	RECIPIENT
NAHASDA	
	RECIPIENT
	RECIPIENT
	RECIPIENT
	RECIPIENT
NAHASDA	
NAHASDA	

---

---

---

---

---

---

---

---




---

---

---

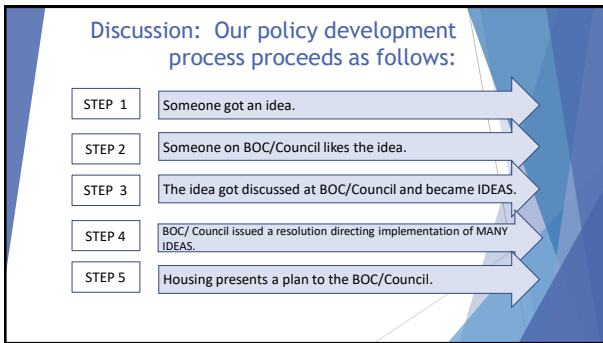
---

---

---

---

---




---

---

---

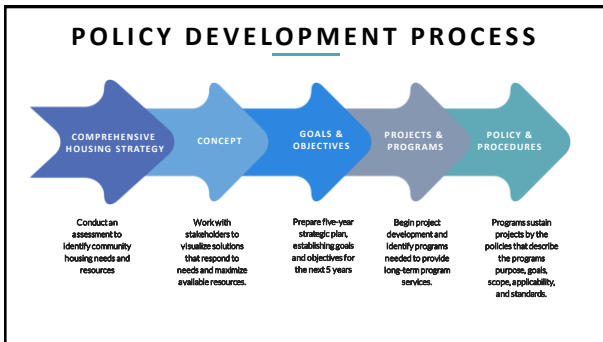
---

---

---

---

---




---

---

---

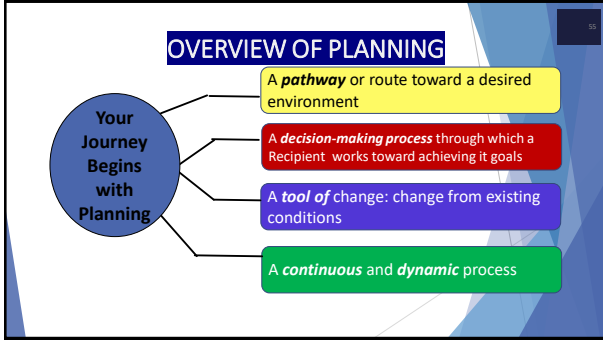
---

---

---

---

---



---

---

---

---

---

---

---

---

### Analyze Housing Market Conditions

- Inventory
- Affordability
- Housing Preferences
- Demographics
- Housing Rehab Needs
- New Construction Needs
- Cost Burden
- Access to Financing
- Creditworthiness
- Financial Resources
- Turnover Rates
- Recent Sales

56

---

---

---

---

---

---

---

---

### Who Are We Serving?

- Mandated NAHASDA Eligibility Requirements**
- Gross income must be within HUD defined income limits (special exceptions apply)
- Must be a Native American family (special exception applies)

---

---

---

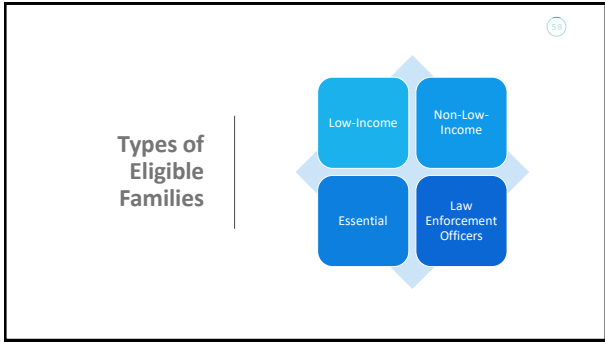
---

---

---

---

---



---

---

---

---

---

---

---

---



---

---

---

---

---

---

---

---



---

---

---

---

---

---

---

---



---

---

---

---

---

---

---

---

### Use TDCs to Plan for Costs 62

- ❖ Purpose - limit cost and design to moderate standards
- ❖ Establishes the maximum amount of funds that may be used on a per unit basis
- ❖ Applies to all housing assisted:
  - ❖ Acquisition, new construction, reconstruction, rehabilitation, homebuyer assistance, model activities

---

---

---

---

---

---

---

---

### TDCs 63

- ❖ Includes all expenditures from all sources of funds
  - ❖ Administrative, planning, financing, site acquisition, on site utility development, site development, profit, design, etc.
- ❖ Recipient must maintain records to show cost per unit is within cost limits
- ❖ Recipients may request a variance to exceed cost limits for cause

---

---

---

---

---

---

---

---




---

---

---

---

---

---

---

---

**WHAT PROGRAMS DO WE HAVE?**

PROGRAM	FUNDING	HOUSING ASSISTANCE TYPE	BENEFICIARIES	AGE RGLD.	TERMS	INCOME	SPECIAL RESTRICTIONS	PAYMENT CALCULATION
Low Rent Housing	MSHARCA	Rental	CCA Member first priority, other housing, long-term disabled and priority	N/A	Subsidized	Low to moderate income	Modestly & Low Income people, also receive the same benefit as Low Income families	Section 8
HR	MSHARCA	Lease w/option to purchase	CCA Members	N/A	Subsidized	Low to moderate income	Disqualified	3% Act
HSE	MCDWROES	Housing Counseling	FA	N/A	N/A	All	12 hours of class	Grant
Personal Skills Development	MSHARCA	Housing Counseling	FA	N/A	N/A	All	None	Grant
On-site Case Counseling	MSHARCA	Housing Counseling	FA	N/A	N/A	All		Grant
ROSS Elderly, Disabled	MCD	Housing Counseling & Case Management	CCA Members	65+	Depends on service	Low to moderate income	0-500 incidents	Grant (Meeting: 2000-2015)
Down Payment Assistance	MSHARCA	Mortgage Assistance	CCA Members	N/A	N/A	All		Conditional Grant
Prequalifying for Mortgage Financing	MSHARCA General Fund	Homeownership, Rehab	FA	N/A	N/A	All		Grant
CCFHA Revolving Loan	General Fund	Home Repairs, Improvements	CCFHA Residents first priority, Other CCA Members second priority	N/A	Individualized	Low to moderate income		Loan
CCF ELDERLY IN FUND	CCF	Home Repairs, Improvements	FA	65+	N/A	\$15,000 MAX.		Grant
Individual Development Account	ROSS	Asset Building	Home Purchaser	N/A	Range	Low to moderate income	\$2 to \$1	Conditional Grant
Senior Apartments	MSHARCA	Rental	CCA members by age first priority, other housing, long-term disabled and priority	65+ = 1st priority, 60+ = 2nd priority, 55 = 3rd priority	Subsidized	Low to moderate income	Modestly & Low Income people, also receive the same benefit as Low Income families	Section 8
Weatherization	BPA	Energy Efficiency (Insulation, Weatherstripping)	CCA members	N/A	N/A	County Area Low Income	Very low income, State funded	Grant

---

---

---

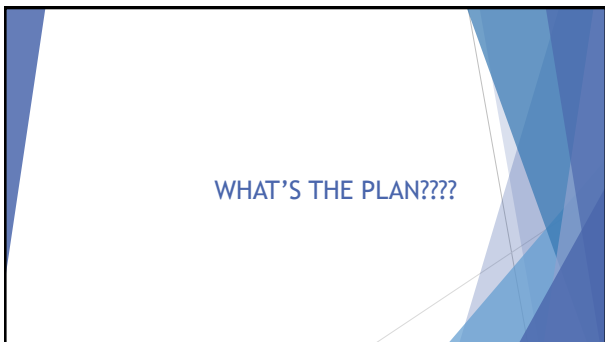
---

---

---

---

---




---

---

---

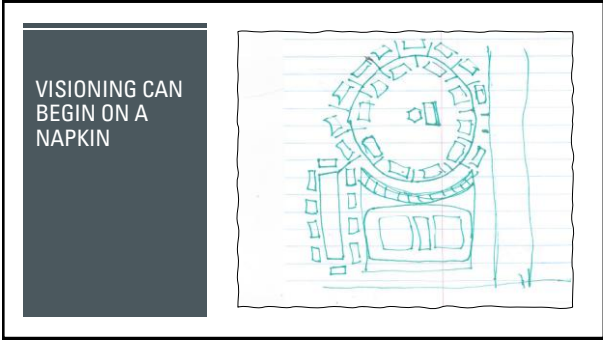
---

---

---

---

---



---

---

---

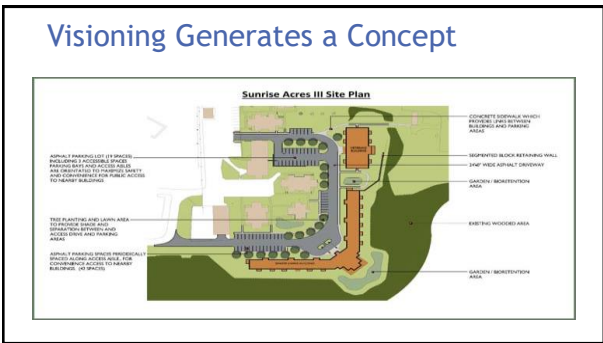
---

---

---

---

---



---

---

---

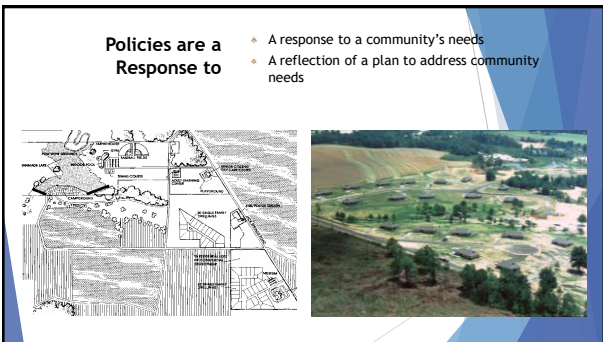
---

---

---

---

---



---

---

---

---

---

---

---

---

**HOW MANY PROGRAMS DOES THIS TDHE OPERATE????**

This TDHE has 160 units of CAS for which they have budgeted \$650,00 of IHBG FUNDS for 2015. They have a tremendous need for land and affordable housing. Consequently, they have initiated a comprehensive housing counseling program in addition to down payment assistance. IHBG funds in the amount of \$230,000 will support the housing counseling program which will be matched with ICDBG funds of \$50,000 for maintenance counseling. Down payment assistance is capped at \$10,000 per qualified family and is funded at \$100,000 IHBG funds.

Land acquisition is necessary to enable construction of 10 rental units for low-income families. The TRIBE has committed \$100,000 towards the acquisition of individual allotted trust property which has access to all infrastructure. \$460,000 of IHBG funds will be used to cover all pre-development costs and earthwork for streets and subdivision layout for the proposed 10 rental detached homes.

There are many families who want to become homeowners and the TDHE has been meeting this need through its IDA program using \$50,000 IHBG funds.

The TDHE will address rehab needs with ICDBG funds of \$400,000 matched with IHBG funds of \$185,000. ICDBG IN THE amount of \$50,000 will support the maintenance counseling efforts.

Many of our families have students needing housing assistance while they attend college. We have pledged \$100,000 of IHBG funds towards this effort. Admin and planning costs are budgeted at \$175,000 of IHBG FUNDS.

---

---

---

---

---

---

---

---

**List the Programs**

PROGRAMS	PROGRAMS
1	5
2	6
3	7
4	8

---

---

---

---

---

---

---

---

**POLICY  
▶ COMPONENTS**

---

---

---

---

---

---

---

---



**Tribe/TDHE  
Mission  
Statement**

- Understand the mission: What is the organization seeking to accomplish?
- Mission statements are not definitions of goals and objectives.
- Before developing goals, procedures, and policies, an organization must understand their mission.
- A mission statement is required as part of the comprehensive Indian Housing Plan (IHP).

---

---

---

---

---

---

---

---

**Policies**

- Policies and procedures are developed after a mission statement, goals, and objectives are established.
- Policies are prepared answers to anticipated problems.
- Policies inform institutions on what is expected and what will be done.
- NAHASDA program requirements for policies require the following:
  - Rents
  - Maintenance and Efficient Operation
  - Insurance Coverage
  - Eligibility for Admission
  - Management
  - Selection

---

---

---

---




---

---

---

---

**Goals and Objectives**

-  Statement of development goals and priorities is required as part of a comprehensive housing strategy.
-  Goals and objectives should reflect the housing strategy planned.
-  How and when do we get to writing policies????

---

---

---

---

---

---

---

---

**POLL: Which is the best example of a mission statement?**

- A. Goals : "Be the Number 1 seller"
- B. Procedures: "File applicant forms after applicant submission"
- C. Objectives: "Complete Task A before moving on to Task B"
- D. Policies: "Organize TDHE waiting list based on priority score"
- E. Accomplish: "Provide housing assistance and opportunities" for self- sufficiency

**Accomplish: "Provide housing assistance and opportunity"**

---

---

---

---

---

---

---

---

**Covenants**

- ◆ Codes:
  - ◆ Applicants as well as occupants are required to adhere to the Tribal Code and other applicable laws with regard to their personal conduct when it impacts their housing obligations and the rights of others. Participants in this program agree to adhere to the following covenants as long as they reside on the premises as a renter and/or subsequently as a homeowner.

---

---

---

---

---

---

---

---

**Application**

- ◆ Application Forms
  - ◆ Intake, the Uniform Residential Loan Application (URLA) or program specific application.
  - ◆ Consent for Credit Report
  - ◆ Homebuyer Counseling Agreement
  - ◆ Goal Statement
  - ◆ Budget Worksheets
  - ◆ Applicable Verifications
  - ◆ Client Action Plan
  - ◆ Applicable Consents to Release Information

---

---

---

---

---

---

---

---

## Application

- ♦ Charges
  - ♦ There is no application fee for applying; however, the homebuyer will be responsible for other fees assessed by lenders in the event the homebuyer successfully exercises their option to purchase. Also, the applicant is not responsible for the cost of the initial credit report obtained by the Recipient for the purposes of qualifying for the LWOP Program.

---

---

---

---

---

---

---

---

## Eligibility

- ♦ Only those who are eligible under the laws and customs of the Tribe to lease tribally owned land for residential purposes or who otherwise obtain the specific approval of the Tribal Executive Committee shall be eligible. Non-Indian and non-member spouse may join in the application process and have their income and credit considered; however, non-Indian and non-member spouses may not inherit property pursuant to the Laws and Customs of the Tribe

---

---

---

---

---

---

---

---

## Eligibility

- ♦ Non-Indian or non-member spouse may not inherit the property in the case of death or be granted the property by consent of the parties or by the Courts in the event of a divorce.

---

---

---

---

---

---

---

---

### Verification

- Procedures for verification will be in accordance with the verification guidelines outlined in HUD Handbook 4350.3 Rev. 1 as it now exists or is hereafter amended.

---

---

---

---


---

---


---

---

### Verification



**Verifiable Information:**  
All information must be verifiable. Verification must be obtained through a third party.



**Verification of Annual Income:**  
Anticipated annual family income for admission will be determined by staff on the basis of verification of income at the time of initial application unless otherwise stated in the program policy or regulations.

---

---

---

---

---

---

---

---

### Selection of Families for a House

- Applicants must first be determined to be eligible which includes the initial HBE class.
- Applicants must be able to qualify for mortgage readiness within a maximum of three years (36 months).
- Qualifications: Applicants must execute and participate in completing a Client Action Plan (CAP), and meet the qualifications for mortgage readiness within 3 years.

---

---

---

---

---

---

---

---

### Selection

- Preferences: Preferences are established for 2 categories of preferences. The Recipient will give first preference to families consisting of all Tribe members enrolled in the Tribe. A second category of preference will be given to enrolled members of the Tribe whose family composition includes non-enrolled Tribe members. There are a total of 8 waiting lists.

---

---

---

---

---

---

---

---

### Selection of Families for a House

1

Waiting List Preference 1: All Tribe families who have never been assisted, do not own a home, are Low- or moderate-income and meet all qualifications.

2

Waiting List Preference 2: All Tribe families who do not own a home, have been previously assisted but did not achieve homeownership for acceptable reasons, are Low- or moderate-income, and meet all qualifications.

3

Waiting List Preference 3: All Tribe families who do not own a home, are currently assisted by a the Recipient's homeownership opportunity program but have not yet achieved homeownership

---

---

---

---

---

---

---

---

### Poll

If a lessee fails to exercise the option to purchase, the lease is typically \_\_\_\_\_ when the option is not exercised.

- Recertified
- Ratified
- Terminated
- An Afterthought
- None of the above

---

---

---

---

---

---

---

---

### Quiz: Implementation Plan

88

You need to create an Implementation Plan. Identify which tasks should start simultaneously in Phase 1. Select all that apply.

- Substantial rehab of 130 CAS rental
- Rehabilitation of 60 owner-occupied
- Build the new Spirit Hills Subdivision infrastructure
- Build 60 housing units in the Spirit Hills Subdivision
- Continuous housing counseling to first-time homebuyers
- Down payment assistance and closing costs

---

---

---

---

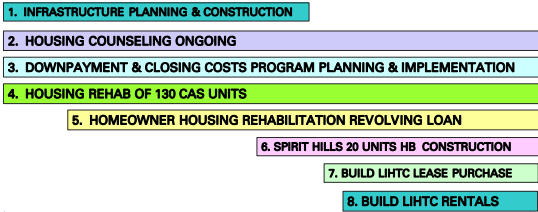
---

---

---

---

### COMPREHENSIVE 5-YEAR IMPLEMENTATION PLAN




---

---

---

---

---

---

---

---

COMPLETION  
DEPENDS  
ON ...

- Financial & Political Environment
- Scope
- Partnerships
- Organizational Skills

---

---

---

---

---

---

---

---

POLL: Select a typical goal from the list below:

- A. Outreach and education for families in need of housing
- B. Development of a cooperative relationship with local business and organizations
- C. Sound and professional management of the TDHE to ensure the viability of all housing programs
- D. Perform activities that meet the needs of the community
- E. All of the above

---

---

---

---

---

---

---

---



---

---

---

---

---

---

---

---



---

---

---

---

---

---

---

---

### Sample: TDHE Designation

- ❖ NCIHA is empowered as the tribally designated entity (TDHE) to develop and manage housing for the following member tribes: Guidiville Rancheria, Hopland Band of Pomo Indians, Tyme-Maidu Tribe of Berry Creek Rancheria, Mooretown Rancheria of Maidu Indians, Manchester Point Arena Band of Pomo Indians, Sherwood Valley Band of Pomo Indians, and Little River Band of Pomo Indians.

---

---

---

---

---

---

---

---

### Sample: TDHE Designation

- ❖ **Laws and Customs of the NCIHA Tribes**
  - ❖ The laws and customs of the NCIHA tribes apply to the programs operated by the NCIHA. Non-Indian and non-member spouses may join in the application process and have their income considered; however, the non-Indian or non-member spouse cannot be the beneficiary or remain in possession of the unit without the qualifying tribal member. The parties or the Courts may not allow the non-Indian or other non-member Native spouse to remain in possession of the unit in the event of divorce or death unless they qualify per the application process as a tribal member.
- ❖ **Jurisdiction**
  - ❖ The following maintains exclusive jurisdiction over disputes that arise with the NCIHA:
    - ❖ The Mendocino County Municipal Court,
    - ❖ Butte County Court, and/or
    - ❖ The Federal District Court for the Northern District of California

---

---

---

---

---

---

---

---

### Sample: Jurisdiction

- ❖ **Code**
  - ❖ Participants and Guests are required to adhere to all applicable codes and other applicable laws about their personal conduct when it influences their housing obligations and the rights of others.
  - ❖ The [Tribe] Police Department is responsible for receiving and investigating any suspicious or illegal acts. Participants must notify the [Tribe ] Police Department for investigation and prosecution.
- ❖ **Organization & Structure the NCIHA**
  - ❖ The mission statement and organization chart is included in Attachment A.

---

---

---

---

---

---

---

---



## Sample: Applicability & Availability of Policies

- ◆ Staff and Officials Applicability
  - ◆ The NCIHA's governing body and staff will comply with all applicable laws, regulations, and policies governing funds granted or loaned to the NCIHA. Additionally, officials and staff must be in compliance with the NCIHA code and applicable state and federal laws and regulations. Failure to comply will be addressed through disciplinary action that could result in termination of employment or removal from office.
- ◆ Posting of Policies
  - ◆ A copy of these Policies shall be prominently posted at the NCIHA Office.
  - ◆ Additionally, a copy of these Policies shall be provided to all Participants. All Participants shall sign an acknowledgment that they have received a copy of, and read, these Policies. A copy of the acknowledgement shall be put in the Participant's file.

---

---

---

---

---

---

---

---

## Sample: Amendments

### Amendments

- ◆ Proposed amendments to these Policies shall be posted prominently at the NCIHA office, for a term of 30 days. The NCIHA shall also provide 30-days' notice to all Participants of the proposed amendments and provide a copy of the proposed amendments to Homebuyers/Participants upon request.

### Waivers

- ◆ Requests for a waiver shall be in writing, clearly indicating the provision of the policies requesting to be waived and shall be supported by documentation of the pertinent facts and grounds.

---

---

---

---

---

---

---

---

## INCOME ELIGIBILITY

---

---

---

---

---

---

---

---

### NAHASDA Defines Income as . . .

**(89) INCOME:** The term 'income' means income from all sources of each member of the household, as determined in accordance with criteria prescribed by the Secretary, except that the following amounts may not be considered as income under this paragraph:

- (A) Any amounts not actually received by the family;
- (B) Any amounts that would be eligible for exclusion under section 1613(a)(7) of the Social Security Act;
- (C) Any amounts received by any member of the family as disability compensation under chapter 11 of title 38, United States Code, or dependency and indemnity compensation under chapter 13 of such title.

---

---

---

---

---

---

---

---

### NAHASDA Regulations

§1000.104 What families are eligible for affordable housing activities?

The following families are eligible for affordable housing activities:

- (a) Low income families.
- (b) A non-low-income family may receive housing assistance in accordance with §1000.110.
- (c) A family may receive housing assistance on a reservation or Native Alaskan area if the family's housing needs cannot be reasonably met without such assistance and the recipient determines that the presence of that family on the reservation or Native Alaskan area is essential to the well-being of Native Alaskan families.

---

---

---

---

---

---

---

---

### NAHASDA Defines Low-Income . . .

**(14) LOW-INCOME FAMILY:** The term 'low-income family' means a family whose income does not exceed 80 percent of the median income for the area, as determined by the Secretary with adjustments for smaller and larger families, except that the Secretary may, for purposes of this paragraph, establish income ceilings higher or lower than 80 percent of the median for the area on the basis of the findings of the Secretary or the agency that such variations are necessary because of prevailing levels of construction costs or unusually high or low family incomes.

**(15) MEDIAN INCOME:** The term 'median income' means, with respect to an area that is an Indian area, the greater of--

- (A) the median income for the Indian area, which the Secretary shall determine; or
- (B) the median income for the United States.

---

---

---

---

---

---

---

---

# PROGRAM GUIDANCE

No. 2021-01  
June 22, 2021

PROGRAM GUIDANCE

**Office of Tribal Affairs  
Program**

No. 2021-01  
June 22, 2021

**PROGRAM:** Indian Housing Block Grant (IBHG)

**FOR:** All Tribal Government Leaders and Tribally Designated Housing Entities (TDHE)

**FROM:** Elder Akiba, Director  
Office of Tribal Affairs, PPHD

**TOPIC:** Income Limits under the Native American Housing Assistance and Self-Determination Act (NAHASDA)

**Purpose:** This guidance explains Program Guidance 2021-01 with the latest Housing and Clinic Development (HCD) income limits applicable to the Native American Housing Assistance and Self-Determination Act (NAHASDA) program.

**Background:** HUD Notice [FHEO-2021-01](#), published April 1, 2021, contains the latest published Indian Family Income (IFI) limits that are applicable to established HUD units in the program of providing NAHASDA assistance. The income limits published in the HUD Notice are effective for Fiscal Year (FY) 2021. They are updated for each calendar year and are available on HUD's public website. The HUD Notice and the HCD limits for FY 2021 are available on HUD's website at [https://www.hud.gov/portal/sections/032021/Income\\_Limits.cfm](https://www.hud.gov/portal/sections/032021/Income_Limits.cfm).

**Guidance:** Pursuant to 24 CFR 1008.10, income limits for an Indian area in the Indian Housing Block Grant (IBHG) program is defined in the greater of:

- 1) The median income of the reservation, or that equivalent in which the Indian area is located; or
- 2) The median income for the United States.

Tribes with large reservations or those that encompass more than one county may have more than one reservation. To ensure administrative burden, the Tribe or TDHE may set certain limits for its reservation(s) at the income limit level of the county with the highest income limits.

If the income limit for a county located within your Indian area is lower than the United States median, you must use the United States median income limits. The Tribal Income LSI for FY 2021 is \$79,900. Therefore, the adjusted income limits for Family size and 80/100 percent of median income are shown below.

**Purpose:**

- Provides income limits for the purpose of determining program eligibility
- Covers three definitions of annual income that
- Updated list of Federally Mandated Exclusions from annual income
- Tribes with large reservations or those that encompass more than one county may have more than one income limit. To reduce administrative burden, the Tribe or TDHE may set income limits for multi-county reservations at the income limit level of the county with the highest income limits.

---

---

---

---

---

---

---

---

---

---

## 2021 U.S. Median Income Limits

2021 U.S. Median Family Income		79,900						
	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
80%	\$ 44,744	\$ 51,136	\$ 57,528	\$ 63,920	\$ 69,034	\$ 74,147	\$ 79,261	\$ 84,365
100%	\$ 55,930	\$ 63,920	\$ 71,910	\$ 79,900	\$ 86,292	\$ 92,684	\$ 99,076	\$ 105,468

---

---

---

---

---

---

---

---

---

---

## Alaska Income Limits

2021 Alaska NHTL Limit:

2021 Median Family Income		89,000						
	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
80%	\$ 71,220	\$ 80,816	\$ 90,412	\$ 100,008	\$ 109,604	\$ 119,200	\$ 128,796	\$ 138,392
100%	\$ 88,776	\$ 102,400	\$ 116,024	\$ 129,648	\$ 143,272	\$ 156,896	\$ 170,520	\$ 184,144

2021 Median Family Income		139,000						
	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
80%	\$ 111,200	\$ 126,816	\$ 142,432	\$ 158,048	\$ 173,664	\$ 189,280	\$ 204,896	\$ 220,512
100%	\$ 139,000	\$ 162,400	\$ 185,840	\$ 209,280	\$ 232,720	\$ 256,160	\$ 279,600	\$ 303,040

---

---

---

---

---

---

---

---

---

---

**PROGRAM GUIDANCE**  
No. 2013-05(R)  
May 06, 2013

Calculating Annual Income for Purposes of Eligibility Under NAHASDA

**PROGRAM GUIDANCE**

**PROGRAM:** Indian Housing Block Grant (IHBG)

**FOR:** All Tribal Government Leaders and Tribally Designated Housing Entities

**FROM:** Eugene J. Boyd, Deputy Assistant Secretary for Native American Programs, PI

**TOPIC:** Calculating Annual Income for Purposes of Eligibility under NAHASDA

**Purpose:** This guidance provides instructions to IHBG recipients on how to calculate annual income under the IHBG program for the purpose of program eligibility. It covers the three definitions of annual income that recipients may adopt in their policies. It includes an updated list of Federally Mandated Exclusions from annual income, and provides guidance on how to treat income previously received by participants pursuant to the annual settlement for the year included (see *Carter et al. v. Can. Indian et al. (Cahoy Settlement)*) and a number of other Tribal Trust settlements. This Program Guidance replaces Program Guidance 1009-02.

**Background:** Housing assistance under the IHBG program is generally limited to low-income Indian families. A low income family is defined as the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA) as a family whose income does not exceed the percent of area median income as the annual decline income which level is higher. In order to determine whether a family is eligible to receive assistance under the IHBG program, recipients must first determine a family's annual income.

**Calculating Annual Income:** To calculate a family's annual income for purposes of IHBG eligibility, recipients should follow these steps:

**Step 1: Adopt a Definition in Policies** - A recipient must indicate in its written policies that govern the eligibility, admission, and occupancy of families for IHBG assistance, the definition(s) of annual income it will use. The IHBG regulations at 24 CFR §1000.10 provide recipients with the option to choose any one of the following three definitions of "annual income":

---

---

---

---

---

---

---

---

---

---

---

---

**PROGRAM GUIDANCE**  
No. 2013-05(R)  
May 06, 2013

**Step 1: Adopt a Definition in Policies** - A recipient must indicate in its written policies that govern the eligibility, admission, and occupancy of families for IHBG assistance, the definition(s) of annual income it will use. The IHBG regulations at 24 CFR §1000.10 provide recipients with the option to choose any one of the following three definitions of "annual income":

**PROGRAM GUIDANCE**

---

---

---

---

---

---

---

---

---

---

---

---

**PROGRAM GUIDANCE**  
No. 2013-05(R)  
May 06, 2013

**Step 3: Federally Mandated Exclusions** - Federally mandated exclusions are amounts specifically excluded under other Federal statutes from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under NAHASDA. HUD periodically publishes a notice in the *Federal Register* identifying the benefits that qualify for this exclusion. The most recent notice was published on December 14, 2012, and can be found in the *Federal Register* at 77 FR 74495. The most common Federally Mandated Exclusions are also included in this Guidance in Attachment D.

**Per Capita Payments and Recent Trust Case Settlements:**

**PROGRAM GUIDANCE**

---

---

---

---

---

---

---

---

---

---

---

---

PROGRAM GUIDANCE  
No. 2012-05-00  
May 06, 2013

**Step 4: Income Verification:** The IHBG regulations at 24 CFR § 1000.128 require the recipient to verify that a family is income eligible based on anticipated annual income. The family's annual income may not exceed the applicable income limit. The family is required to provide income documentation to verify this determination. The recipient must have income verification policies in place and is required to maintain the documentation on which the determination of eligibility is based. The recipient may also require a family to periodically verify its income in order to determine housing payments or continued occupancy consistent with locally adopted policies. The recipient may choose to use third party income verification methods or request documentation such as income tax returns, W-2s, pay stubs, and other appropriate information as stipulated by their policies to adequately estimate annual income.

---

---

---

---

---

---

---

---

### Qualifying as Affordable Housing

- ◆ When the family is low-income at the following times:
  - ◆ Rental housing, at the time of the family's initial occupancy;
  - ◆ A contract to purchase existing housing, at the time of purchase;
  - ◆ A lease-purchase agreement for existing housing or for new construction, time agreement is signed; and
  - ◆ A contract to purchase housing to be constructed, at the time the contract is signed.

---

---

---

---

---

---

---

---

### NON-LOW-INCOME

---

---

---

---




---

---

---

---

### Non-Low-Income Families

-  Must determine that family's housing needs cannot be met without IHBG assistance
-  Cannot receive the same dollar benefit as low-income families
-  Must describe how housing assistance is calculated.

---

---

---

---

---

---

---

---

### Non-Low-Income Rental Payment Requirements

- The rent (including homebuyer payments under a lease purchase agreement) to be paid by a non-low-income family cannot be less than [income of non-low-income family/income of family at 80 percent of median income] x [rental payment of family at 80 percent of median income], but need not exceed the fair market rent or value of the unit.

Other assistance, including down payment assistance, to non-low-income families, cannot exceed [income of family at 80 percent of median income/income of non-low-income family] x [present value of the assistance provided to family at 80 percent of median income].

---

---

---

---

---

---

---

---

Notice PIH 2014-02  
Administrator, Office of Native American Programs;  
Issued: January 24, 2014  
Expires: Effective until amended, revoked or superseded  
Cross Reference: 24 CFR §§ 1000.104 - 1000.118  
PIH Notice 1999-6

**Continued Occupancy.** If a rental or homeownership family was low-income at the time it entered the program (as described in 24 CFR § 1000.147), and subsequently becomes non-low-income, it may continue to participate in the program if the recipient's admission and occupancy policies authorize such families to continue to receive assistance (including a determination that there is a need for housing for each family that cannot reasonably be met without such assistance). This includes a family member or household member who subsequently takes ownership of a homeownership unit, by inheriting a homeownership unit.

a determination that there is a need for housing for each family that cannot reasonably be met without such assistance

---

---

---

---

---

---

---

---

# ESSENTIAL FAMILIES

---

---

---

---




---

---

---

---

### Essential Families

-  Must determine that family's housing needs cannot be met without IHBG assistance
-  Must determine that family's presence is essential to well-being of Native Alaskan families
-  Examples of "essential" families - teachers, health care providers, other professionals

---

---

---

---

---

---

---

---

### Reference

PIH Notice 2014-02 Essential Families. A non-low-income family may receive IHBG assistance if the recipient determines that the presence of the family is essential to the well-being of Native Alaskan families and the need for housing for such family cannot be met without such IHBG assistance. Families assisted under this provision can receive the same amount of benefits as low-income families, as provided in 24 CFR § 1000.110(e), and they do not count as non-low-income families for the purposes of the 10 percent authority even though HUD approval is not required. Guidance on documenting these determinations is covered further in this Notice. To be considered an essential family, an IHBG recipient must first determine a family is essential to the well-being of the Native Alaskan families residing in the Native Alaskan area and determine that the need for housing the family cannot be reasonably met without IHBG assistance. **The criteria and rationale for determining if a family is essential should be clearly described in the recipient's policy, and documentation must be maintained that clearly supports the determination.** The recipient must make a determination about each essential family and document its determination even in cases when HUD approval is not required. The recipient may use the guidance in this Notice when determining if there is a need for housing for the family that cannot be reasonably met without IHBG assistance.

---

---

---

---

---

---

---

---

# ADJUSTED INCOME

---

---

---

---

---

---

---

---

## Statutory Deductions

\$480 for children under 18, persons of disabilities over 18, and full-time students over 18

\$400 for elderly or disabled family

Medical and attendant expenses over 3% of income

---

---

---

---

---

---

---

---

## Statutory Deductions cont'd.

Childcare expenses that enable family members to work or go to school

Earned income of minors under 18

Travel expenses, not to exceed \$25 per family per week

Other exclusions provided in the local housing policies

*These exclusions are applicable regardless of which method of calculating annual income is used.*

---

---

---

---

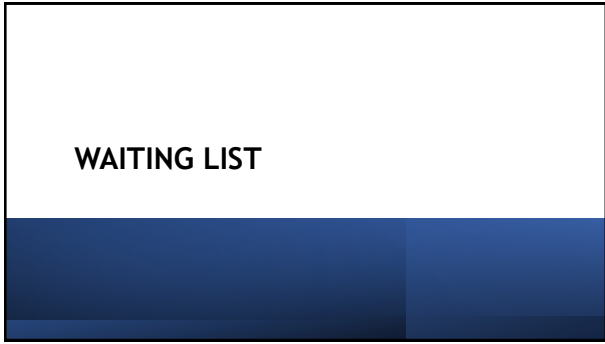
---

---

---

---






---

---

---

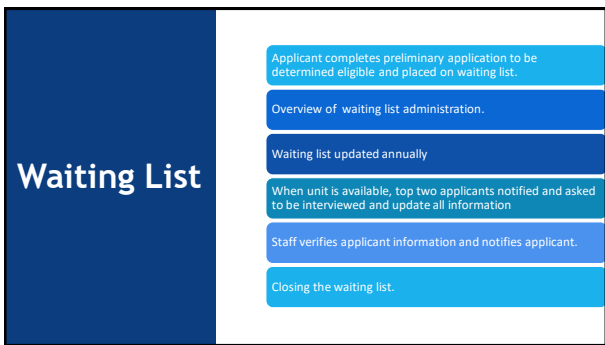
---

---

---

---

---




---

---

---

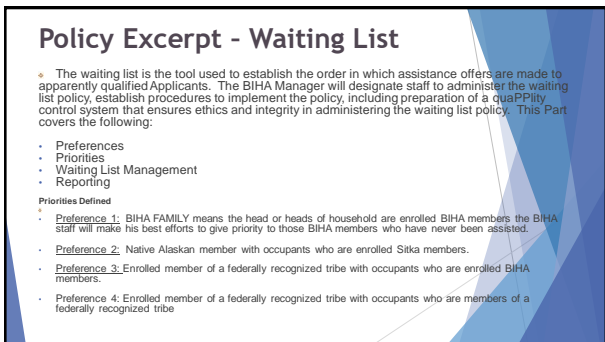
---

---

---

---

---




---

---

---

---

---

---

---

---

**Waiting List Policy Procedure Worksheet**

	ROW TITLE 01				
	ROW TITLE 02				
	ROW TITLE 03				
	ROW TITLE 04				

---

---

---

---

---

---

---

---

# SELECTION

---

---

---

---

---

---

---

---

## Selection

(b) **TENANT SELECTION TENANT AND HOMEBUYER SELECTION**- The owner or manager of affordable rental housing assisted with grant amounts provided under this Act shall adopt and utilize written tenant and homebuyer selection policies and criteria that--

- (1) are consistent with the purpose of providing housing for low-income families;
- (2) are reasonably related to program eligibility and the ability of the applicant to perform the obligations of the lease; and
- (3) provide for--

- (A) the selection of tenants and homebuyers from a written waiting list in accordance with the policies and goals set forth in the Indian housing plan for the tribe that is the grant beneficiary of such grant amounts; and
- (B) the prompt notification in writing of any rejected applicant of the grounds for any rejection to any rejected applicant of that rejection and the grounds for that rejection.

---

---

---

---

---

---

---

---

## SCREENING

- ❖ Screening for eligibility involves consideration of numerous factors
  - ❖ program requirements,
  - ❖ income restrictions, and
  - ❖ established preferences, and
  - ❖ established priorities.
- ❖ Although many of these factors may be locally determined, a written eligibility policy provides specific guidance regarding determining eligibility.

---

---

---

---

---

---

---

---

## Preferences

- ❖ Preferences affect only the order selection of applicants on the waiting list.
  - ❖ Policies must identify available preferences and give all applicants an opportunity to show that they qualify for available preferences.
- ❖ The preference specifically identified under NAHASDA allows Recipients to give preference to tribal members first in providing housing assistance.

---

---

---

---





---

---

---

---

## Selection Responsibility Worksheet

 ROW TITLE 01					
 ROW TITLE 02					
 ROW TITLE 03					
 ROW TITLE 04					

---

---

---

---

---

---

---

---

# VERIFICATION

---

---

---


---

---

---

---

---



### Verification

- o Cuts across all occupancy areas
- o All information in tenant file must be verified and properly documented
- o Recipient needs to establish verification standards and procedures in the A&O Policy
- o Documentation and verification is a joint responsibility of the Recipient and family
  - o Family must provide required paperwork and sign release forms
  - o Family must be responsive to requests

---

---

---

---

---

---

---

---

### What Must Be Verified

- Income, assets and asset income
- Income exclusions
- Allowances and deductions
- Family composition
- Social security numbers
- Income exclusions

---

---

---

---

---

---

---

---

### What Must Be Verified?

- ▶ Family members under 18
- ▶ Age or disability of head or spouse
- ▶ Disability of other family members
- ▶ Full time student status
- ▶ Childcare costs
- ▶ Disability assistance expense
- ▶ Unreimbursed medical expenses

---

---

---

---

---

---

---

---

### Verification Standards

- > Third party – preferred
- > Second party – apply when third-party is unobtainable or not timely
  - ▶ Phone or interview by Recipient staff
  - ▶ Recipient records information
    - > Date/time of contact
    - > Name and source of information
    - > Recipient staff name/signature
    - > Summary of information
  - ▶ Rationale for using oral verification
- ▶ First party – least preferred

---

---

---

---





---

---

---

---

### Verification Responsibility Worksheet

 ROW TITLE 01					
 ROW TITLE 02					
 ROW TITLE 03					
 ROW TITLE 04					

---

---

---

---

---

---

---

---

## LEASE REQUIREMENTS

---

---

---

---

---

---

---

---

## Lease Requirements

**SEC. 207. LEASE REQUIREMENTS AND TENANT SELECTION. [25 USC 4137]**

(a) LEASES- Except to the extent otherwise provided by or inconsistent with tribal law, in renting dwelling units in affordable housing assisted with grant amounts provided under this Act, the owner or manager of the housing shall utilize leases that--

- (1) do not contain unreasonable terms and conditions;
- (2) require the owner or manager to maintain the housing in compliance with applicable housing codes and quality standards;
- (3) require 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;
- (4) specify 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

---

---

---

---

---

---

---

---

## CONFLICT OF INTEREST

---

---

---

---

---

---

---

---

## Conflict of Interest Requirements



Report a potential conflict of interest to ONAP



Disclose to the public the conflict of interest, the nature of the assistance to be provided the individual, and the specific basis for which there is no conflict.

---

---

---

---

---

---

---

---

## Conflict of Interest Policies

- ▶ Two types of conflict of interest policies required:
  - ▶ Employee Conflict of Interest - consistent with NAHASDA requirements.
  - ▶ New Requirement: Organizational Conflict of Interest



---

---

---

---

---

---

---

---

According to the HUD NAHASDA regulations, the conflict of interest provision does not apply in instances where a person who might otherwise be included under the conflict of interest provision is low-income and is selected for assistance in accordance with the recipient's written policies for eligibility, admission and occupancy of families for housing assistance with NAHASDA funds. Additionally, there is no conflict of interest under applicable tribal law.

A copy of this public disclosure will be provided to the HUD Area office prior to providing any financial assistance. If you have any questions, please feel free

ACTIVITY: FIND THE CITATIONS IN THE 24 CFR PART 1000 NAHASDA REGULATIONS

---

---

---

---

---

---

---

---

Attached please find a copy of the public disclosures made pertaining to the NAHASDA housing assistance made available to James Bond, Programs Service Manager, and Michelle Ellenwood, Executive Assistant of the NPTHA. Because of an unexpected cancellation, Mrs. Ellenwood's and Mr. Bond's assistance was scheduled prior to the submittal of this notice. If you have any questions, please feel free to contact me.

ACTIVITY: FIND THE CITATIONS IN THE 24 CFR PART 1000 NAHASDA REGULATIONS

---

---

---

---

---

---

---

---

**SAMPLE: Notice of Disclosure**

In accordance with the Native American Housing Assistance and Self-Determination Act regulations anyone receiving assistance under NAHASDA and who participates in the decision-making process or who gains inside information with regard to NAHASDA assisted activities and benefits from such activities, must make a disclosure to the public and to HUD.

In 1997 Comp Grant funds were awarded for window repair work for eligible participants in Projects 13 and 14. Scheduling is done by site in order to keep costs affordable. Michelle Ellenwood, Executive Assistant, occupies a home for which project assistance was planned under the old Comp Grant program. Mrs. Ellenwood meets the low-income criteria and does not have to repay for this assistance. Selection was based on submission of all the required documentation which was processed and verified to be true and accurate by NPTHA staff. Mrs. Ellenwood has no debt to the NPTHA and would have been eligible for this assistance regardless of her status as the Executive Assistant. Consequently, her role as a Executive Assistant of the NPTHA and as a participant in the program do not present a conflict of interest.

---

---

---

---

---

---

---

---

**OCCUPANCY AND MAINTENANCE**

---

---

---

---

---

---

---

---



### Minimum Occupancy Standards

143

- ◆ Not required by law
- ◆ Does applicant meet definition of "family?"
- ◆ Does family's income fall within prescribed limits?
- ◆ Is applicant suitable customer and able to meet requirements of program?




---

---

---

---

---

---

---

---

### Maintenance Requirements

- ▶ Who is responsible?
- ▶ What are the standards?
- ▶ What enforcement measures are prescribed?
- ▶ How frequently do you inspect?

---

---

---

---

---

---

---

---

### NAHASDA Requirements

- ▶ Maintain owned and managed units
- ▶ Allocate funds to provide for the continued maintenance and efficient operations of housing inventory
- ▶ Identify the manner in which inventory will be protected and maintained

---

---

---

---

---

---

---

---

### Maintenance Types

- ▶ Preventive
- ▶ Corrective
- ▶ Routine/ Janitorial
- ▶ Emergency
- ▶ Cosmetic
- ▶ Deferred

---

---

---

---

---

---

---

---

### Scheduling

- ▶ Preventive Maintenance
  - ▶ Annual basis, by month
- ▶ Routine Maintenance
  - ▶ Monthly basis, by week
- ▶ Daily Maintenance
  - ▶ Schedule work for the next day

---

---

---

---

---

---

---

---

### Work Orders

Charge account #  
Required craft: plumbing, electrical

- ▶ Work originated
- ▶ Method used
- ▶ Time to complete work
- ▶ Date/time start/complete
- ▶ Signature of issuer
- ▶ Description of work to be performed or problem to be solved
- ▶ Description of equipment necessary

---

---

---

---

---

---

---

---

### Work Order Procedures

- ▶ Work Order (W.O.) issued
- ▶ W.O. received by maintenance dept.
- ▶ Maint. Supervisor reviews and clears W.O.
- ▶ Maint. Supervisor assigns W.O. to appropriate staff and sets schedule
- ▶ Work is completed
- ▶ W.O. returned and recorded

---

---

---

---

---

---

---

---

When can the Tribe/TDHE charge a renter for maintenance?

- A. Renters pay all maintenance
- B. Never
- C. When damage is beyond normal wear and tear
- D. Always

---

---

---

---





---

---

---

---

### Maintenance Policy/Procedure Worksheet

 ROW TITLE 01				
 ROW TITLE 02				
 ROW TITLE 03				
 ROW TITLE 04				

---

---

---

---

---

---

---

---




---

---

---

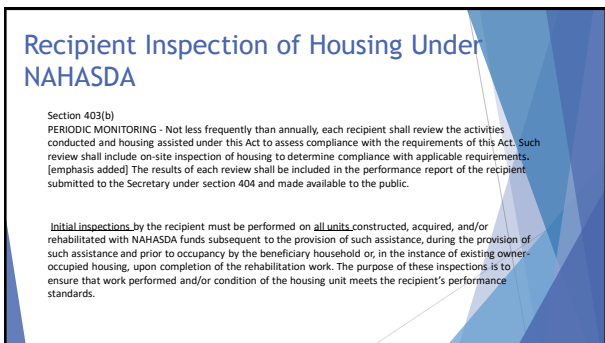
---

---

---

---

---




---

---

---

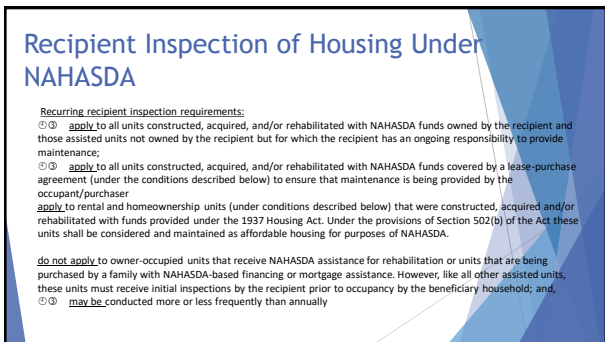
---

---

---

---

---




---

---

---

---

---

---

---

---

## Excerpt - Inspection Policy

### A. Frequency

Inspections will be conducted at least annually to ensure that the participant is meeting their responsibility for providing routine and non-routine maintenance.

#### 1. New participants

- a. Schedule monthly inspections for at least the next three (3) months and will meet the mandatory attendance at the maintenance counseling dates, known as the "Better Renter's Series".
- a. Upon a satisfactory determination that the participant is meeting his maintenance obligations, schedule inspections every three (3) months.
- a. Upon a satisfactory determination that the participant is meeting his maintenance obligations, schedule inspections every six (6) months.
- a. Upon a satisfactory determination that the participant is meeting his maintenance obligations, schedule inspections every year.

#### 1. Existing participants

- a. Schedule a regular inspection at least annually. Upon a satisfactory determination that the participant is meeting his maintenance obligations and is in compliance with the terms of the lease, schedule the next inspection for next year.
- a. Upon a disatisfactory determination, apply appropriate level of scheduled inspections to ensure that corrected action has been taken. Depending on the severity, the NCHA Executive Director will prescribe a schedule accordingly.
- a. Upon a serious finding of non-compliance, terminate or follow procedure for new participants.

---

---

---

---

---

---

---

---

---

---

## RECERTIFICATION

---

---

---

---

---

---

---

---

---

---

## Recertification

- ❖ Not required, but highly recommended
- ❖ Scheduling can be on lease execution anniversary date or spread out to manage workload
- ❖ Process should begin 90 days in advance
- ❖ Use third-party verification whenever possible
- ❖ Give at least 30 days notice of rent increase

---

---

---

---

---

---

---

---

---

---

### Interim Recertification Examples

- ❖ Job loss
- ❖ Retirement
- ❖ Change in family composition - death, birth
- ❖ Resident moves out and changes income
- ❖ Pay raise
- ❖ Unemployed resident becomes employed
- ❖ Substantial increase in allowances, e.g., childcare or travel expenses
- ❖ Resident turns 62 years of age

---

---

---

---

---

---

---

---

## INSURANCE

---

---

---

---

---

---

---

---

### Insurance

PROGRAM GUIDANCE 2014-03 (RECIP)

March 21, 2014 Page 2

**Purpose:** The intent of this guidance is to provide IHBG recipients with direction on the following: (1) When is insurance required? (2) What insurance requirements apply, and when is insurance adequate? (3) What insurance requirements apply to contractors and subcontractors? And, (4) What are other insurance requirements under MAHASDA?

**When is insurance required and in what amount?** Insurance coverage is required for housing units that are owned, operated, or assisted with IHBG funds. Adequate insurance is insurance in an amount that will protect the financial stability of the recipient's IHBG program. This means that the recipient's housing units and privately owned housing units that are assisted with IHBG funds must be adequately insured for one of the two time periods listed below, whichever is longer:

- the useful life (affordability period) of recipient or privately owned units, or
- the term of a repayment or forgiveness agreement for all or part of the IHBG assistance for privately owned housing units.

Housing units assisted with IHBG funds must remain affordable for their useful life as determined by the recipient (affordability period), and recipients must have a means of insuring their investment during this period. Therefore, as long as the useful life (affordability period) has not expired, IHBG-assisted housing units owned or operated by the recipient must be covered by adequate insurance.

---

---

---

---

---

---

---

---

### Insurance

Insurance for housing may be either a purchased insurance policy from an insurance provider or a plan of self-insurance. Recipients may not require insurance on privately owned housing assisted with IHBG funds, if there is no risk of loss or exposure to the recipient, or if the assistance is in an amount less than \$5,000, unless repayment of all or a portion of the assistance is part of the assistance agreement. If private homeowners are unable to provide proof of insurance during the useful life (affordability period) of the assisted properties, the recipient must take steps to insure the units in order to protect its IHBG investment. This protection can be provided in a number of ways including:

- Purchase insurance for housing units that are owned, operated, or assisted with IHBG funds in an amount that is adequate to provide replacement cost to protect the IHBG investment.
- Have IHBG-assisted, private homeowners provide proof of replacement insurance for the useful life (affordability period) of the assistance received.
- Purchase insurance for privately owned housing units in the amount of the outstanding balance of the IHBG assistance provided.

---

---

---

---

---

---

---

---

### Insurance

Insurance for housing may be either a purchased insurance policy from an insurance provider or a plan of self-insurance. Recipients may not require insurance on privately owned housing assisted with IHBG funds, if there is no risk of loss or exposure to the recipient, or if the assistance is in an amount less than \$5,000, unless repayment of all or a portion of the assistance is part of the assistance agreement. If private homeowners are unable to provide proof of insurance during the useful life (affordability period) of the assisted properties, the recipient must take steps to insure the units in order to protect its IHBG investment. This protection can be provided in a number of ways including:

- Purchase insurance for housing units that are owned, operated, or assisted with IHBG funds in an amount that is adequate to provide replacement cost to protect the IHBG investment.
- Have IHBG-assisted, private homeowners provide proof of replacement insurance for the useful life (affordability period) of the assistance received.
- Purchase insurance for privately owned housing units in the amount of the outstanding balance of the IHBG assistance provided.

---

---

---

---

---

---

---

---

### Insurance

Insurance for housing may be either a purchased insurance policy from an insurance provider or a plan of self-insurance. Recipients may not require insurance on privately owned housing assisted with IHBG funds, if there is no risk of loss or exposure to the recipient, or if the assistance is in an amount less than \$5,000, unless repayment of all or a portion of the assistance is part of the assistance agreement. If private homeowners are unable to provide proof of insurance during the useful life (affordability period) of the assisted properties, the recipient must take steps to insure the units in order to protect its IHBG investment. This protection can be provided in a number of ways including:

- Purchase insurance for housing units that are owned, operated, or assisted with IHBG funds in an amount that is adequate to provide replacement cost to protect the IHBG investment.
- Have IHBG-assisted, private homeowners provide proof of replacement insurance for the useful life (affordability period) of the assistance received.
- Purchase insurance for privately owned housing units in the amount of the outstanding balance of the IHBG assistance provided.

---

---

---

---

---

---

---

---

**Insurance**

*For example:* If a fire destroyed all or part of some housing units that were subject to a useful life (affordability period), and those housing units were not insured, then there is a risk of loss or exposure to the recipient's IHBG program that may result in which of the following:

- A. Loss of IHBG funds
- B. Repayment of IHBG funds
- C. Loss of revenue
- D. All of the above

---

---

---

---

---

---

---

---

**Policy Excerpt - Insurance**

**Insurance**

- The BIHA is responsible for carrying insurance on the structure of all property owned by the BIHA. Tenants are responsible for payment of the deductible for damage covered by BIHA's insurance carrier. The BIHA Manager will make the determination to charge or not to charge a Tenant for the difference between the amount the insurance company covers and the total cost to repair or replace a unit.

**Contents Insurance**

- The BIHA does not provide contents insurance and will not be liable for damages to Tenants' contents. All Tenants will be counseled about the importance of content insurance.

---

---

---

---

---

---

---

---

**PROCUREMENT**

---

---

---

---

---

---

---

---



**Procurement Requirements**

- Written policies and procedures regarding
  - Competition
  - Methods of procurement to be followed
  - Contract cost and price
  - Awarding agency review
  - Bonding (*2 CFR 200.325 and 24 CFR 1000.26(a)(11) provide acceptable methods when inconsistencies exist*)
  - Contract provisions
  - Conflict of interest

---

---

---

---

---

---

---

---

**Subrecipient vs. Contractor**

- Neither procurement contracts nor Subrecipient Agreements are required by HUD regulations when IHBG activities are carried out by various departments of grantee's government or organization itself.
  - In this case, use interagency agreements (e.g., cities and towns)..
- Distinction between a contractor and a subrecipient is clear. A development firm hired to build a new senior center is a contractor. A community development corporation running senior service programs at the center is a subrecipient.
- A subrecipient can be designated by a grantee, while a contractor must be selected through a competitive procurement process.
- Procurement process tends to be more rigorous for contractors, while the administrative and monitoring requirements tend to be greater for subrecipients.

---

---

---

---

---

---

---

---

**Required Components**

- **Statement of work:** a description of the work to be performed, a schedule for completion of the work, and a budget, all in sufficient detail for you to monitor performance.
- **Records and reports:** the grantee must specify the records the subrecipient must maintain (including how long it must keep them) and the reports the subrecipient must submit (including dates for submitting them).
- **Program income:** the Agreement must set forth the program income requirements, detailed in 24 CFR 1006..
  - Address whether program income received is to be returned to the grantee or retained by the subrecipient.
- **Suspension and termination:** the Agreement must specify that suspension or termination may occur if the subrecipient materially fails to comply with any term of the Agreement. The Agreement may also be terminated for the grantee's convenience, consistent with 2 CFR Part 200.
- **Reversion of assets:** when the Agreement ends, the subrecipient must transfer to the grantee any IHBG funds on hand and accounts receivable attributable to the use of IHBG monies.
- **Uniform Administrative Requirements:** The Agreement must also state that subrecipients will comply with the following requirements 2 CFR part 200.

---

---

---

---

---

---

---

---

**Subrecipient Checklist**

• A subaward - an award provided by the Recipient to a sub-entity in order for the sub-entity to carry out part of the Federal award received by the Recipient.

---

---

---

---

---

---

---

---

- |   |     |    |
|---|-----|----|
| 1. Subrecipient determines assistance eligibility of individuals as part of subaward performance;   | YES | NO |
| 2. Subrecipient's performance is measured relative to objectives of the Federal program being met;  | YES | NO |
| 3. Subrecipient is responsible for programmatic decision making;  | YES | NO |
| 4. Subrecipient is responsible for ensuring Federal requirements outlined in award are followed.  | YES | NO |
| 5. Subrecipient uses the Federal funds to carry out a program for a public purpose as opposed to providing goods or services for the benefit of the DHHL. | YES | NO |

---

---

---

---

---

---

---

---

- |  |     |    |
|--|-----|----|
| 1. Entity provides similar goods or services to many different purchasers;   | YES | NO |
| 2. Entity normally operates in a competitive environment with other like vendors;  | YES | NO |
| 3. Entity provides goods or services that are secondary support to the programmatic activities or operation of the Federal program (e.g., office equipment, supplies, body-cameras, copying/printing, etc.); and | YES | NO |
| 4. Entity is not subject to flow-down compliance requirements of the Federal program as a result of the procurement contract (though similar requirements may apply for other reasons).                          | YES | NO |

---

---

---

---

---

---

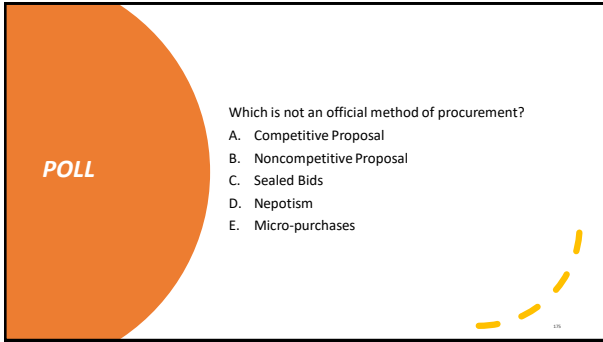
---

---

**POLL**

Which is not an official method of procurement?

- A. Competitive Proposal
- B. Noncompetitive Proposal
- C. Sealed Bids
- D. Nepotism
- E. Micro-purchases



---

---

---

---

---

---

---

---

**TOTAL DEVELOPMENT COSTS**



---

---

---

---

---


---

---

---

**Total Development Costs**

- ❖ Applying TDC limits:
  - All residential new construction, rehabilitation and acquisition activities
  - Any type of residential structure
  - 1937 Act units obligated after 9/30/97
- ❖ PIH Notice 2019-19 includes the updated schedule for the maximum amount of funds that may be used for affordable housing



---

---

---

---

---

---

---

---



**Total Development Costs**

- ◆ Help ensure affordability
- ◆ HUD calculates:
  - ◆ Hard construction costs
  - ◆ Soft costs
  - ◆ Site costs
- ◆ Recipient can request a variance of their TDCs

---

---

---

---

---

---

---

---

▶ **WRITING POLICIES**

---

---

---

---

---

---

---

---

Policies are written in **clear, concise, simple language.**

Policy statements address **what is the rule** rather than how to implement the rule.

Policy statements are readily **available to the community** and their authority is clear.

As a body, policies represent a consistent, **logical framework for action**

---

---

---

---

---

---

---

---

## Level of Detail

- General rule is that the level of detail must be both sufficient and appropriate for your audience and your subject.
- Sufficient usually means the right type of information and the right amount of it.
- Appropriate usually means fitting for the topic and the audience.

- Does it give the user sufficient information to complete the required action?  
 Yes  No
- Does it provide sufficient information to guide the user in exercising good judgment and discretion?  
 Yes  No
- Is the information of the right type, considering both subject and audience?  
 Yes  No
- With this information, can the audience do what we want them to do?  
 Yes  No
- Is the level of detail appropriate to the subject? (An ethics policy may not need the same detail as an inventory procedure.)  
 Yes  No
- Is the level of detail appropriate to the type of audience—its experience, knowledge, and size (e.g., novice versus expert, customers versus employees)?  
 Yes  No
- How comfortable is the audience with the subject?  
 Very  Somewhat  Little  Not at all

---

---

---

---

---

---

---

---

---

---

## Essential Components



**Clear Title:** Use as few words as possible and ensure that users at any reading level can understand.

**Brief Description of the Policy:** A description or introduction orients users to the scope and purpose of the policy.

**Key Dates:** Dates include the approval date of the original document, the annual review date, and the latest version date. Dates are important for tracking versions around legislative and other updates.

**Policy Purpose:** The purpose describes why the policy exists. This includes such concerns as legal and regulatory needs and problems or conflicts a policy aims to avoid.

**Policy Statement:** The core of the document and usually the lengthiest part. The policy statements specify the main audience for the policy, conditions and restrictions for applying the policy, expectations, and exclusions.

**Scope:** This concerns which roles or departments the policy covers.

---

---

---

---

---

---

---

---

---

---

## More Ideas

- History:** Knowing the history is useful for understanding changes.
- Scope:** This concerns which roles or departments the policy covers.
- Responsibilities or Responsible Party:** Indicate what role, department, or group must maintain the policy. Alternatively, for some policies governed by regulations, this section lists roles responsible for executing the policy.
- Definitions:** Describe key terms, jargon, or ambiguous terms. Always explain key terms in a separate definitions section or at first mention in the text of your policy or procedure to ensure that everyone has the same understanding of terms. Definitions are particularly important for terms that may have multiple meanings.
- Related Documents:** Attach other policies, procedures, regulatory documents, forms, and guidelines for reference.

Name 5 terms to include in definitions.

Identify 3 other related documents to reference A&O policy.

---

---

---

---

---

---

---

---

---

---

## Calculating Readability in Procedures

- ▶ Gunning Fog Index helps determine the approximate reading level of a document.
- ▶ Use the Gunning Fog Index to minimize the number of actions per step in a procedure.
- ▶ Basic Rule: One action per step.

**Steps:**

1. Count the number of steps in the procedure.
2. Count the number of action verbs in the procedure.
3. Divide the number of action verbs by the number of steps.
4. If the number in step 3 is higher than 1.5, check the steps to see if they can be broken down further.

**Example:**

1. After locating ports A and B, insert B into A.
2. While turning the handle to the left, tighten the screw.

**Calculations:**

Number of steps = 2  
 Number of action verbs = 4  
 $4 / 2 = 2$  - **TOO HIGH! MINIMIZE THE ACTIONS!**

**Example:**

1. Locate ports A and B.
2. Insert B into A.
3. Turn the handle to the left.
4. Tighten the screw.

**Calculations:**

Number of steps = 4  
 Number of action verbs = 4  
 $4 / 4 = 1$  - **JUST RIGHT!!!**

---

---

---

---

---

---

---

---

## Policy and Procedure Vocabulary

- ❖ Action verbs that are common in policies and procedures.
- ❖ Be sure to use simple, honest verbs.
- ❖ Choose words that are one to two syllables long - don't be complicated.
- ❖ Consistency is just as important as simplicity.

accept	distribute	maintain	restrict
add	e-mail	make	review
approve	encourage	monitor	rotate
ask	enforce	notify	schedule
assist	enter	obtain	select
attach	evaluate	open	send
buy	examine	operate	separate
change	explain	participate	serve
check	fax	pay	show
claim	file	place	sign
close	fill out	plan	sort
compile	find	prepare	start
complete	finish	protect	submit
connect	follow up	prove	test
conserve	forward	provide	tighten
contact	gather	pull	total
contract	give	purchase	transfer
control	help	push	turn
correct	hold	read	use
decide	inspect	receive	validate
delete	issue	record	verify
deliver	install	repeat	wait
describe	interview	release	weigh
détach	jog	remove	with-draw
determine	keep	repeat	write
develop	list	repeat	
discuss	mail	request	

---

---

---

---

---

---

---

---

## POLL

1. Committing to a policy without the ability to make changes is an organizational problem.  
TRUE FALSE
2. "This Policy is designed to assist in the resolution of complaints by program applicants and Residents and to afford them a fair and reasonable opportunity to have their responses heard and considered by the Recipient's Manager. It is not intended to provide a forum for the aggrieved party to challenge the Recipient's policies, tribal, federal, or state codes, requirements and/or regulations, to settle domestic disputes or resolve matters that are a police or court matter."

This statement is an example of discretionary wording:  
TRUE FALSE

---

---

---

---

---

---

---

---

**POLICY (TEMPLATE)** 187

- Policy Statement
- Purpose of the Policy
- Authorization
- Applicable Laws, Regulations, Resources
- Jurisdiction
- Applicability – Who does this policy apply to?
- The Policy

Policy Name:					
Section #:	Section Title:	Adopted:	Date:	Formerly Soc#::	
Resolution # Approval:		Original:	Date:	Modification:	Date:
Responsible Executive:					

---

---

---

---

---

---

---

---

---

---

### Divide Policy into Parts or Sections

Part 1 – Overview of the Plan

- ▶ Overview of the Recipient
- ▶ Organization and Structure of the Recipient
- ▶ Mission
- ▶ Ethics, Conflict of Interest
- ▶ Funding Relationships
- ▶ Applicable Regulations
- ▶ History of Recipient
- ▶ Organization Chart
- ▶ Mission statement
- ▶ Insert chart regarding appropriations
- ▶ List of laws and regs

Would you add anything else?

---

---

---

---

---

---

---

---

---

---

**Preparing to Develop Policy Includes . . .**

TASK	RESPONSIBLE PARTY
<ol style="list-style-type: none"> <li>1. Policy Analysis</li> <li>2. Policy Review and Adoption</li> <li>3. Implement Policies</li> <li>4. Monitor Staff Actions to Ensure that Policies are Being Followed</li> </ol>	

---

---

---

---

---

---

---

---

---

---

### Part 1 – Overview of the Programs

This part contains information about

- ▶ Indian housing operation,
- ▶ Roles and responsibilities, and
- ▶ Partnerships.

---

---

---

---

---

---

---

---

### Part 2: General Requirements for Admissions

#### General Requirements Outline

- Overview of Programs, Direction
- Indian preference
- General Eligibility/Ineligibility
- Income
- Application Process
- Screening
- Waiting list management
- Verification
- Tenant selection

#### Content Guidance

- Purpose
- Low-rent for low- to moderate-income families
- Member of federally recognize tribe; 1<sup>st</sup> preference to an enrolled member
- Must be low-income or mod family
- Application, 18+, complete appl, process for reviewing
- Background Check

Identify 1 content area for each general requirement.

---

---

---

---

---

---

---

---

### Part 3: General Occupancy Requirements

#### General Requirements Outline

- Leasing
- Insurance
- Maintenance
- Housekeeping Standards
- Inspections
- Reexaminations
- Transfers
- Abandonment

Identify 1 content area for each general requirement.

---

---

---

---

---

---

---

---



**Part 4: Non-Compliance**

General Requirements Outline      Content Guidance

- Collections
- Termination
- Appeal/Grievance

Identify 1 content area for each general requirement.

---

---

---

---

---

---

---

---

**Poll**

- ◆ "In the case of a low-income family residing in a dwelling unit assisted with IHBG grant amounts under this Act, the monthly rent or homebuyer payment (as applicable) for such dwelling unit may not exceed \_\_\_ percent of the monthly adjusted income of such family."
  - A. 10
  - B. 30
  - C. 15
  - D. 25
  - E. 20

---

---

---

---

---

---

---

---

**Sample Policy Provisions**

---

---

---

---

---

---

---

---

**Policy Disclaimers**

- Disclaimers are an important way to protect an organization.
- Policies and procedures are not contracts and may be changed at any time.
- Allow attorneys to review and approve disclaimers.

“This Policy is designed to assist in the resolution of complaints by program applicants and Residents and to afford them a fair and reasonable opportunity to have their responses heard and considered by the Recipient’s Manager. It is not intended to provide a forum for the aggrieved party to challenge the Recipient’s policies, tribal, federal, or state codes, requirements and/or regulations, to settle domestic disputes or resolve matters that are a police or court matter.”

---

---

---

---

---

---

---

---

**Acknowledgement Statements**

“I have received a copy of the handbook/policy/procedure. I understand that it is my obligation to read and understand this material to abide by the rules established by the organization. I also understand that I am governed by these policies and procedures and that organization may change them at will.”

“I have received the tenant handbook, which outlines both my obligations and my privileges as a tenant. I agree to familiarize myself with the contents of this book and to seek clarification of any item that I do not understand. I also agree to comply with the standards and rules outlined in this document.”

---

---

---

---

---

---

---

---

**Discretionary Wording**

- Committing to a policy without the ability to make changes is an organizational problem.
- It is important to reserve the right to make changes throughout your policies and procedures.
- Include clear wording in the policy and procedure itself to build in flexibility.

“This policy is a guideline only. Circumstances may arise in which we find it necessary to take other steps not specifically designated here. We reserve the right to do so at our discretion.”

“The Recipient reserves the right to make modifications to these rules if needed for health or safety purposes, programmatic purposes, management purposes, or necessitated by a change in Tribal Code, and applicable federal law or regulations.”

---

---

---

---

---

---

---

---

### Discretionary Wording

"The reasons for a determination of ineligibility are based on the Recipient's policies and other applicable program concerns or regulations. Although an Applicant may meet the basic criteria for eligibility, any one of several reasons can form the basis of a determination of ineligibility."

"The Recipient has the discretion to determine if any other group of persons qualifies as a family."

"The following does not represent an exhaustive list of reasons an Applicant may be denied for final selection as a Tenant; however, it is illustrative of many common reasons for a determination of ineligibility."

---

---

---

---

---

---

---

---

EXAMPLE: LEASE PURCHASE PROGRAM

---

---

---

---

---

---

---

---

▶ LEASE PURCHASE  
k

---

---

---

---

---

---

---

---

**Lease Option Period Varies**

- ❖ Low Income Housing Tax Credits (LIHTC) - 15 years minimum, then home bought or conveyed
- ❖ Mortgage-driven - 1-5 years typical, then home bought with a mortgage loan
- ❖ Different needs, different designs

---

---

---

---

---

---

---

**Why Lease Purchase?**  
?

- ❖ Helps potential home buyers to save for down payment/closing costs/mortgage and replacement reserve
- ❖ Opportunity to train potential home buyers on obligations of homeownership
- ❖ Provide homeownership opportunities to nontraditional homebuyers
- ❖ *Consistent with tradition of Native families owning their own home*

---

---

---

---

---

---

---

**Lease Option Period Varies**

- ❖ Low Income Housing Tax Credits (LIHTC) - 15 years minimum, then home bought or conveyed
- ❖ Mortgage-driven - 1-5 years typical, then home bought with a mortgage loan
- ❖ Different needs, different designs

---

---

---

---

---

---

---

### Mortgage-Driven Lease Purchase

- ❖ Firm option to purchase period
- ❖ Shorter lease periods
- ❖ Option to purchase EXPIRES
- ❖ Homebuyer education is critical for success
- ❖ Homebuyers must get loans to purchase
- ❖ Can solve issues of readiness to buy
- ❖ Does not solve insufficient income

---

---

---

---

---

---

---

---

### Shorter Lease Periods

- ❖ Design your lease period to match the readiness of your clients
  - ❖ Minor credit repair and counseling - maybe 2 years
  - ❖ More extensive issues - up to 4-5 years

---

---

---

---

---

---

---

---

### Homebuyer Education

- ❖ Won't be successful without a strong homebuyer education program
- ❖ Families need support to repair credit, get mortgage-ready
- ❖ Make participation mandatory to continue in the program
- ❖ May give credit against purchase price for hours spent in homebuyer education

---

---

---

---

---

---

---

---

### Sales Proceeds

- ❖ Upon sale, the proceeds flow to the seller
- ❖ Use depends on how seller financed the development
  - ❖ Pay down the Tribal 184 loan
  - ❖ Pay down any other debt used to build
  - ❖ If IHBG, then is program income

---

---

---

---

---

---

---

---

### Financial Capacity/\$



- ❖ Down payment and closing costs to purchase properties
- ❖ Subsidies to make properties affordable to target market of homebuyers
- ❖ Unrestricted cash balance to cover market changes or rent losses
  - ❖ Defined by Fannie Mae to be greater of 10% of PITI for portfolio mortgages for 6 months or total PITI for the largest mortgage for a minimum of six months
- ❖ Plan to remarket or improve/market/convert to rental those properties that initial renters do not purchase

---

---

---

---

---

---

---

---

### Housing Management Capacity

- ❖ Property management experience
- ❖ Understanding of single-family housing management issues in the community
- ❖ Clear division of maintenance responsibilities between tenants and owner, and capacity to manage



---

---

---

---

---

---

---

---

### Assemble Critical Components

- ❖ Get unrestricted cash for rent loss and unexpected conditions
- ❖ Assign experienced staff/consultants
- ❖ Develop housing management plan (including role of tenant in maintenance and one-on-one counseling)
- ❖ Design homeownership training/ counseling

---

---

---

---

---

---

---

---

### Use and Occupancy Agreement

- ❖ AKA Lease
- ❖ Term is the length of the Client Action Plan
- ❖ Address same things as a rental lease
  - ❖ Grounds for termination
  - ❖ Minimum rent (can be debt payment plus admin or management fee)
  - ❖ Inspections

---

---

---

---

---

---

---

---

### Know your Market

- ❖ Potential home buyers and their affordability
- ❖ Potential properties
  - ❖ Costs to acquire and rehabilitate or construct
  - ❖ After-rehabilitation appraised value
  - ❖ Current single-family homeownership capacity
  - ❖ Costs to insure, pay utilities, manage and maintain



---

---

---

---

---


---

---

---

### Biggest Risks....

- ❖ Will the families actually buy the house?
- ❖ The lower the income and the less required up-front, the higher the risks (e.g.. loss of income, lack of incentive to stay)
- ❖ Tenant does not meet required training/ maintenance obligations/sweat equity requirements
- ❖ Experience of existing programs - longer the lease period the higher the risk
- ❖ Political climate




---

---

---

---

---


---

---

---

### Biggest Risks.....

- ❖ Delinquent rent payments
  - ❖ Remember, if there are two or more rent payment delinquencies, could prevent lender's willingness to permit tenant assumption of loan
- ❖ Insufficient market
  - ❖ Customers - limited customer base - good credit homebuyers with insufficient dp/cc/rr
- ❖ Lack of familiarity with mortgage financing
  - ❖ Remember, mortgage payments do not fluctuate like low-rent programs. BE SURE FAMILIES ARE PREPARED.




---

---

---

---

---

---

---

---

### PROJECT DESCRIPTION

The specific type of project proposed is for new construction of 20 units of low- to moderate-income single family detached homes to be sold to qualified families as summarized in the table.

SIZE OF UNITS	3 BEDROOMS (1150 SQ. FT.)	3 BEDROOMS (1750 SQ. FT.)	4 BEDROOMS (2000 SQ. FT.)	TOTAL
NUMBER OF UNITS	5	9	6	
A. DWELLING CONSTRUCTION COST	\$94,800 X 5	\$116,688 X 9	\$134,800 X 6	\$2,311,792
B. CONTINGENCY (10%)	\$9,480 X 5	\$11,668 X 9	\$13,480 X 6	233,179
C. SFFELT DOWN PAYMENT	(\$25,000) X 5	(\$33,000) X 9	(\$40,000) X 6	(680,000)
D. TENANT DOWN PAYMENT (\$500)	(\$500) X 5	(\$500) X 9	(\$500) X 6	(10,000)
TOTAL COST W/CONTINGENCY				\$1,564,971
TOTAL LOAN AMOUNT (A+C+D)				\$1,644,792

---

---

---

---

---

---

---

---



## WAITING LIST

Considering the current waiting lists for low- and moderate-income families needing 3- and 4-bedroom units, the NPTHA will be able to allow at least 20 families to assume the NPTHA loan and become homeowners.

	Mortgage Readiness Range	# of Applicants	Projected FY
1	0 to 1 month (immediate)	7	2005
2	2 to 6 months	2	2005
3	7 to 12 months	7	2006
4	13 to 24 months	9	2007
5	25 to 30 months	0	2008
6	31 to 36 months	3	2008
	<b>TOTAL</b>	<b>28</b>	<b>5 Years**</b>

---

---

---

---

---

---

---

---

---

---

---

---

## Policy Considerations




---

---

---

---

---

---

---

---

---

---

---

---

## Description of Program

- A Recipient created Lease With Option to Purchase (LWOP) Program to assist tribal members and Alaska Natives who may not be ready to meet qualification requirements for a mortgage loan from a private lender.
- The Recipient will own the property and rent to a homebuyer family for a specified rental period, at the end of which, the renter has an exclusive option to purchase the property.

---

---

---

---

---

---

---

---

---

---

---

---

### Description of Program: Goals

1

Promote affordable rent to own opportunities for those low- and moderate-income enrolled members who need assistance in qualifying for mortgage financing.

2

Provide opportunities for low- and moderate-income enrolled members to better access the private mortgage market for homeownership on The Recipient property.

3

Facilitate self-sufficiency of tribal members.

---

---

---

---

---

---

---

---

### Description of Program

• Eligibility: Program Specific Criteria

- Have sufficient, stable income required to meet the minimum rent and the other financial obligations of maintaining and buying a home;
- Be able to overcome the obstacles to mortgage readiness in a period of time not to exceed 36 months;
- Be committed to schedule the time to participate in the required group counseling and one-on-one counseling tailored to the individual family's needs;
- Participants entering this program must remember that this is not a substitute low-rent program. Additionally, failure to exercise the option or to comply with any of the other terms and conditions of the program will result in termination of participation, termination of homebuyer family LWOP Agreement, and loss of the exclusive option to purchase.



---

---

---

---

---

---

---

---

### Description of Program

Eligibility Continued

- All applicants must be able to pay the minimum rent and achieve mortgage readiness according to their Client Action Plan but not to exceed three (3) years. Homebuyers must
- Be committed to purchasing the leasehold property.
- Have sufficient income required to meet the minimum rent and the other financial obligations of maintaining and buying a home.
- Be able to overcome the obstacles to mortgage readiness in a period of time not to exceed 36 months except in extreme circumstances.
- Be committed to schedule the time to participate in the required group counseling and the one-on-one counseling tailored to the individual family's needs.

---

---

---

---

---

---

---

---

## Description

- ◆ Eligibility Continued
- ◆ House payments made under the LWOP Agreement will be applied to the purchase of the home to cover debts service when the option is exercised.

---

---

---

---

---

---

---

---

## Covenants

- ◆ Codes:
- ◆ Applicants as well as occupants are required to adhere to the Tribal Code and other applicable laws with regard to their personal conduct when it impacts their housing obligations and the rights of others. Participants in this program agree to adhere to the following covenants as long as they reside on the premises as a renter and/or subsequently as a homeowner.

---

---

---

---

---

---

---

---

## Application

- ◆ Application Forms
  - ◆ Intake, the Uniform Residential Loan Application (URLA) or program specific application.
  - ◆ Consent for Credit Report
  - ◆ Homebuyer Counseling Agreement
  - ◆ Goal Statement
  - ◆ Budget Worksheets
  - ◆ Applicable Verifications
  - ◆ Client Action Plan
  - ◆ Applicable Consents to Release Information

---

---

---

---

---

---

---

---

## Application

- Charges
  - There is no application fee for applying; however, the homebuyer will be responsible for other fees assessed by lenders in the event the homebuyer successfully exercises their option to purchase. Also, the applicant is not responsible for the cost of the initial credit report obtained by the Recipient for the purposes of qualifying for the LWOP Program.

---

---

---

---

---

---

---

---

## Eligibility

- Only those who are eligible under the laws and customs of the Tribe to lease tribally owned land for residential purposes or who otherwise obtain the specific approval of the Tribal Executive Committee shall be eligible. Non-Indian and non-member spouse may join in the application process and have their income and credit considered; however, non-Indian and non-member spouses may not inherit property pursuant to the Laws and Customs of the Tribe

---

---

---

---

---

---

---

---

## Eligibility

- Non-Indian or non-member spouse may not inherit the property in the case of death or be granted the property by consent of the parties or by the Courts in the event of a divorce.

---

---

---

---

---

---

---

---

### Verification

- Procedures for verification will be in accordance with the verification guidelines outlined in HUD Handbook 4350.3 Rev. 1 as it now exists or is hereafter amended.

---

---

---

---


---

---


---

---

### Verification



**Verifiable Information:**  
All information must be verifiable. Verification must be obtained through a third party.



**Verification of Annual Income:**  
Anticipated annual family income for admission will be determined by staff on the basis of verification of income at the time of initial application unless otherwise stated in the program policy or regulations.

---

---

---

---

---

---

---

---

### Selection of Families for a House

- Applicants must first be determined to be eligible which includes the initial HBE class.
- Applicants must be able to qualify for mortgage readiness within a maximum of three years (36 months).
- Qualifications: Applicants must execute and participate in completing a Client Action Plan (CAP), and meet the qualifications for mortgage readiness within 3 years.

---

---

---

---

---

---

---

---

### Selection

- ◆ Preferences: Preferences are established for 2 categories of preferences. The Recipient will give first preference to families consisting of all Tribe members enrolled in the Tribe. A second category of preference will be given to enrolled members of the Tribe whose family composition includes non-enrolled Tribe members. There are a total of 8 waiting lists.

---

---

---

---

---

---

---

---

### Selection of Families for a House

1

Waiting List Preference 1: All Tribe families who have never been assisted, do not own a home, are Low- or moderate-income and meet all qualifications.

2

Waiting List Preference 2: All Tribe families who do not own a home, have been previously assisted but did not achieve homeownership for acceptable reasons, are Low- or moderate-income, and meet all qualifications.

3

Waiting List Preference 3: All Tribe families who do not own a home, are currently assisted by a the Recipient's homeownership opportunity program but have not yet achieved homeownership

---

---

---

---

---

---

---

---

### LWOP Program Rent or Other Payments

- ◆ Rent Payment for Low-Income Families: During the rental phase of the LWOP program, low income families will be charged a monthly rent payment based upon the following:
  - ◆ Debt service on the underlying Recipient's loan for the home,
  - ◆ An income-based management fee of a minimum of \$150, and
  - ◆ Buy-down expenses.

---

---

---

---

---

---

---

---

### LWOP Program Rent or Other Payments

- ◊ Rent Payments for Moderate Income Families:
  - ◊ Families who are moderate income: monthly rental payments will be determined by the the Recipient on a case-by-case basis based on at least the following:
    - ◊ The Fair Market Rent published by HUD in the Federal Register
    - ◊ The debt service
    - ◊ A monthly income-based management fee of a minimum of \$150, and
    - ◊ Buy-down expenses.

---

---

---

---

---

---

---

---

### Income

- ◊ Policy: The Recipient shall use the definition of income from the following that is most advantageous to the family or to the housing entity:
  - ◊ IRS,
  - ◊ Census,
  - ◊ Section 8
- ◊ Verification: Household's annual income may not exceed the applicable income limits as published annually by HUD.

---

---

---

---

---

---

---

---

### Client Action Plan & Housing Counseling

- ◊ Completion of Required Actions: All homebuyer and each occupant of the premises will complete all "Required Actions" as described in the Client Action Plan (CAP), which shall become a part of the LWOP Agreement. The Homebuyers must agree that all actions will be completed in a period of time not to exceed \_\_\_\_\_ months from the effective date of the LWOP Agreement.

---

---

---

---

---

---

---

---

### Client Action Plan & Housing Counseling

- ♦ Condition of Participation: As a condition of participation in the the Recipient's housing programs the homebuyer will attend and satisfactorily complete Housing Education/Counseling provided by the the Recipient in accordance with the Recipient's Housing Counseling Policy.

---

---

---

---

---

---

---

---

### Client Action Plan & Housing Counseling

- ♦ One-on-One Housing Counseling: If the Recipient deems it advisable or necessary, the homebuyer will attend as many One-on-One Housing Counseling sessions as needed to meet the requirements with respect to property maintenance, financial management, compliance with the Client Action Plan, and such other matters as may be appropriate.

---

---

---

---

---

---

---

---

### Client Action Plan & Housing Counseling

- ♦ Failure to Comply: with the Housing Counseling requirements or the Client Action Plan is a matter of non-compliance which will result in termination of participation in the LWOP Program.

---

---

---

---

---

---

---

---



**ORGANIZING FOR ADMISSIONS AND OCCUPANCY MANAGEMENT**

When does program policy development begin?

---

---

---

---

---

---

---

---

**Commencement of a Project!!!**

- ▶ Staff begins the planning process to ensure
  - ▶ Allowability
  - ▶ Allocable
  - ▶ Reasonable
  - ▶ Consistent with
    - ▶ Values
    - ▶ Mission
    - ▶ Goals
    - ▶ Performance standards

---

---

---

---

---

---

---

---

**Organizing for A&O Management**

- ❖ Who will define the organization's framework?
- ❖ What programs will be offered?
- ❖ How many functions will staff perform?
- ❖ Who will pass policies?
- ❖ Who will write the procedures?

**WHO DEFINES THE CHAIN OF COMMAND?**

---

---

---

---

---

---

---

---




---

---

---

---

---

---

---

---

**Part 1: Purpose of the Admissions and Occupancy Policy**

<ul style="list-style-type: none"> <li>• General Requirements Outline</li> </ul>	<ul style="list-style-type: none"> <li>• Content Guidance</li> </ul>
<ul style="list-style-type: none"> <li>• Purpose of A&amp;O</li> <li>• Policy development</li> <li>• Mandatory policies</li> <li>• Optional policies</li> <li>• Applicability</li> <li>• Jurisdiction</li> <li>• Interpretations</li> </ul>	<ul style="list-style-type: none"> <li>• Guided by mission statement</li> <li>• Governing body of the Recipient (BOC for TDHE, TC for housing department, passing policy by resolution, etc.)</li> <li>• Those driven by laws and regs</li> <li>• Those reflection Recipient's requirements</li> </ul>

---

---

---

---

---

---

---

---

**Sample: Purpose**

- The purpose of the policy is to:
  - Provide transparency.
  - Provide daily guidance to housing staff in the performance of routine activities.
  - Make decisions more transparent to staff and the community.
  - Are more defensible than unwritten policies when challenges arise.
  - Ensure that all housing staff does things the same way, thus promoting consistency and fairness while also minimizing the potential for disputes or legal actions.
  - Provide a foundation for sound management and supervision.
  - Provide a basis for auditor justification.

---

---

---

---

---

---

---

---

### Sample: Policy Statement

- It is the policy of NCIHA to provide safe, decent, and sanitary housing to Northern Circle Indian low-income families who could not otherwise afford housing. These Policies are enacted to ensure that housing programs are managed in compliance with applicable federal laws and regulations.
- Mission Statement and Guiding Principles: To help tribal governments with the development of their communities. To do so in a way that is consistent with the tribe's social, cultural, and economic values. To alleviate some of the effects of poverty by providing quality housing to Native Americans in Northern California.

---

---

---

---

---

---

---

---

### Poll

As the housing Recipient, we follow a written policy defining policy development and amendments.

YES

NO

---

---

---

---

---

---

---

---

SAMPLE INDEX

---

---

---

---

---

---

---

---

## THE RECIPIENT

### INTRODUCTION

- A. Summary
- B. Laws & customs of the tribe
- C. Prohibited use of premises
- D. Law enforcement
- E. Jurisdiction
- F. Overview and history of the program
- G. Recipient mission

### MANAGEMENT CAPACITY

- A. Organization and structure of the recipient
- B. The recipient's commitment to ethics and serv
- C. Conflict of interest
- D. Applicable codes & laws
- E. Other APPLICABLE REQUIREMENTS
- F. PARTNERSHIPS

---

---

---

---

---

---

---

---

## POLICY & PROCEDURES

### OVERVIEW

- A. Purpose of the policy
- B. Contents of the policy
- C. Applicability of policies
- D. Program applicability
- E. Staff and officials' applicability
- F. Updating and revising the policy
- G. Number and gender
- H. Authorization of executive director

### INDIAN PREFERENCE

- A. Tribal requirements
- B. NAHASDA requirements

---

---

---

---

---

---

---

---

## ELIGIBILITY

### DEFINITIONS OF FAMILY & HOUSEHOLD MEMBERS

- A. Overview
- B. Family and household
- C. Family break-up; remaining member of tenant family
- D. Head of household
- E. Spouse, cohead, and other adult
- F. Dependent
- G. Full-time student
- H. Elderly and near-elderly persons, and elderly family
- I. Persons with disabilities and disabled family
- J. Guests
- K. Foster children and foster adults
- L. Absent family members
- M. Live-in aide
- N. Guardian
- O. Successor

---

---

---

---

---

---

---

---

**ELIGIBILITY CRITERIA**

- A. Income eligibility and targeting
- B. Social security numbers
- C. Family consent to release of information

**DENIAL OF ADMISSION**

- A. Overview
- B. Required denial of admission
- C. Reasons for denial of admission
- D. Use of illegal substances
- E. Screening
- F. Criteria for deciding to deny admission
- G. Prohibition against denial of assistance to victims of domestic violence, dating violence, and stalking
- H. Consideration of derogatory findings
- I. Notice of eligibility or denial

---

---

---

---

---

---

---

---

**APPLICATIONS, WAITING LIST AND TENANT SELECTION**

**THE APPLICATION PROCESS**

- A. Application forms
- B. Application process
- C. Charges
- D. Communication
- E. Accessibility of the application process
- F. Placement on the waiting list
- G. Essential information for waiting list placement

**APPLICANT FILES**

- A. Filing requirements
- B. File management
- C. Inactive file
- D. File retention
- E. Confidentiality

---

---

---

---

---

---

---

---

**MANAGING THE WAITING LIST**

- A. Overview
- B. Waiting List Organization
- C. Basics
- D. Priorities
- E. Preferences
- F. Opening and closing the waiting list
- G. Placement on the waiting list
- H. Entering new applicants
- I. Family outreach
- J. Reporting changes in family circumstances
- K. Updating the waiting list
- L. Removal from the waiting list
- M. Reporting requirements

---

---

---

---

---

---

---

---

**TENANT SELECTION**

- A. Waiting list selection
- B. Selection method
- C. Preferences
- D. Priorities
- E. Notification of selection
- F. The application interview
- G. Final eligibility determination

Identify a preference and then a priority.

---

---

---

---

---

---

---

---

**OCCUPANCY STANDARDS AND UNIT OFFERS**

**OCCUPANCY STANDARDS**

- A. Overview
- B. Determining unit size
- C. Exceptions to occupancy standards

**UNIT OFFERS**

- A. Overview
- B. Number of offers
- C. Time limit for unit offer acceptance or refusal
- D. Refusals of unit offers
- E. Accessible units
- F. Designated housing

**Occupancy Use**

- A. Authorized occupants
- B. Exclusive use
- C. Guests or visitors
- D. Unauthorized occupants
- E. Temporary absence from unit

---

---

---

---

---

---

---

---

**INCOME AND RENT DETERMINATIONS**

**ANNUAL INCOME**

- A. Overview
- B. Household composition and income
- C. Annual income
- D. Earned income
- E. Earned income disallowance
- F. Business income
- G. Assets
- H. Periodic payments
- I. Payments in lieu of earnings
- J. Welfare assistance
- K. Periodic and determinable allowances
- L. Additional exclusions from annual income

---

---

---

---

---

---

---

---

### ADJUSTED INCOME

#### DETERMINING ADJUSTED INCOME

- A. Dependent deduction
- B. Elderly or disabled family deduction
- C. Medical expenses deduction
- D. Disability assistance expenses deduction
- E. Childcare expense deduction
- F. Permissive deductions
- G. Other deductions

---

---

---

---

---

---

---

---

### CALCULATING RENT

#### OVERVIEW OF INCOME-BASED RENT CALCULATIONS

- A. Minimum rent
- B. Financial hardships affecting minimum rent
- C. Utility allowances
- D. Prorated rent for mixed families
- E. Flat rents and family choice in rents

#### EXHIBITS

- A. Annual income inclusions
- B. Annual income exclusions
- C. Treatment of family assets
- D. Earned income disallowance
- E. The effect of welfare benefit reduction

---

---

---

---

---

---

---

---

### VERIFICATION

#### GENERAL VERIFICATION REQUIREMENTS

- A. Family consent to release of information
- B. Overview of verification requirements
- C. Up-front income verification
- D. Third-party written and oral verification
- E. Self-certification

#### VERIFYING FAMILY INFORMATION

- A. VERIFICATION OF LEGAL IDENTITY
- B. SOCIAL SECURITY NUMBERS
- C. DOCUMENTATION OF AGE
- D. FAMILY RELATIONSHIPS
- E. VERIFICATION OF STUDENT STATUS
- 5F. DOCUMENTATION OF DISABILITY
- G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS
- H. VERIFICATION OF PREFERENCE STATUS

---

---

---

---

---

---

---

---

**REEXAMINATIONS**

**INTERIM REEXAMINATIONS**

- A. Overview
- B. Changes in family and household composition
- C. Changes affecting income or expenses
- D. Processing the interim reexamination

**RECALCULATING TENANT RENT**

- A. Overview
- B. Changes in utility allowances
- C. Notification of new tenant rent
- D. Discrepancies

---

---

---

---

---

---

---

---

**PETS**

**ASSISTANCE ANIMALS**

- A. Overview
- B. Approval of assistance animals
- C. Care and handling

**PETS**

- A. Overview
- B. Management approval of pets
- C. Standards for pets
- D. Pet rules
- E. Pet deposits
- F. Non-refundable nominal pet fee
- G. Other charges

---

---

---

---

---

---

---

---

**TRANSFERS**

**EMERGENCY TRANSFERS**

- A. Overview
- B. Emergency transfers
- C. Emergency transfer procedures
- D. Costs of transfer

**RECIPIENT REQUIRED TRANSFERS**

- A. Overview
- B. Types of recipient required transfers
- C. Adverse action
- D. Cost of transfer

**TRANSFERS REQUESTED BY TENANTS**

- A. Overview
- B. Types of resident requested transfers
- C. Eligibility for transfer
- D. Security deposits
- E. Cost of transfer
- F. Handling of requests

**Transfer processing**

- A. Overview
- B. Transfer list
- C. Transfer offer policy
- D. Good cause for unit refusal
- E. Deconcentration
- F. Reexamination policies for transfers

---

---

---

---

---

---

---

---



**TERMINATION**

**TERMINATION BY TENANT**

- A. Tenant chooses to terminate the lease

**TERMINATION BY RECIPIENT – MANDATORY**

- A. Overview
- B. Failure to provide consent
- C. Failure to provide social security documentation
- D. Failure to accept the recipient's offer of a lease revision
- E. Methamphetamine conviction
- F. Noncompliance with community service requirements.
- G. Death of a sole family member

---

---

---

---

---

---

---

---

**TERMINATION**

**TERMINATION BY RECIPIENT – OTHER AUTHORIZED REASONS**

- A. Overview
- B. Mandatory lease provisions
- C. Other authorized reasons for termination
- D. Alternatives to termination of tenancy
- E. Criteria for deciding to terminate tenancy
- F. Prohibition against terminating tenancy of victims of domestic violence, dating violence, and stalking

---

---

---

---

---

---

---

---

**TERMINATION**

**NOTIFICATION REQUIREMENTS, EVICTION PROCEDURES AND RECORD KEEPING**

- A. Overview
- B. Conducting criminal records checks
- C. Disclosure of criminal records to family
- D. Lease termination notice
- E. Eviction
- F. Notification to post office
- G. Record keeping

**FAMILY DEBTS TO THE RECIPIENT**

- A. Overview
- B. Repayment policy
- C. Incentives for timely rent payment

---

---

---

---

---

---

---

---

**GRIEVANCES AND APPEALS**

**INFORMAL HEARINGS FOR RECIPIENT HOUSING APPLICANTS**

- A. Overview
- B. Informal hearing process

**GRIEVANCE PROCEDURES FOR RECIPIENT HOUSING RESIDENTS**

- A. Requirements

**EXHIBITS**

HACA GRIEVANCE PROCEDURE FOR RECIPIENT HOUSING RESIDENTS

---

---

---

---

---

---

---

---

**PROGRAM INTEGRITY**

**INTRODUCTION**

**CORRECTIVE MEASURES AND PENALTIES**

- A. Under- or overpayment
- B. Family-caused errors and program abuse; recipient-caused errors; or program abuse
- C. Criminal prosecution
- D. Fraud and program abuse recoveries

---

---

---

---

---

---

---

---

**VIOLENCE AGAINST WOMEN ACT (VAWA)**

**NOTIFICATION, DOCUMENTATION, CONFIDENTIALITY**

- A. Overview
- B. Definitions
- C. Notification
- D. Documentation
- E. Confidentiality

**EXHIBITS**

NOTICE TO RECIPIENT HOUSING APPLICANTS AND TENANTS REGARDING THE VIOLENCE AGAINST WOMEN ACT (VAWA)

---

---

---

---

---

---

---

---

***It has come to our attention that your guests have exceeded their stay by a month. According to our policy, you have two options:***

---

---

---

---

---

---

---

---

***Can you include a provision in your policy that prohibits people who are of a particular religion from applying under NAHASDA?***

---

---

---

---

---

---

---

---

***Use the Outline & Identify the Sections that should be Referenced.***

- RE: Excessive Partying and Pit Bull Complaints Received

Dear Mr. BOND,

- A complaint was recently registered with CIDTHA concerning excessive partying at your residence. We would like to take this time to remind you of the ANYTHA Occupancy Policy:
- **Residents shall conduct themselves and cause other persons who are on the premises with their consent to conduct themselves in a manner which will not disturb his/her neighbor's peaceful enjoyment of their accommodations and will be conducive to maintaining the neighborhood in a decent, safe and sanitary condition. Excessive alcohol abuse, partying, fighting, quarreling, and any other action or activities that interfere with or disturb the health, safety, or right to peaceful enjoyment of the premises by other residents are prohibited.**
- We have also received notice that you still have your Pit Bull. You were notified on February 22, 2008 that having a Pit Bull is strictly prohibited in CIDTHA units. The dog must be removed from your residence within 30 days of this letter. Failure to do so is a violation of the Low-Rent Lease Agreement and constitutes a breach of your contract. A member of our staff will conduct a follow up inspection in 30 days to be sure that the dog has been removed from the property.
- Your cooperation is greatly needed and much appreciated. Please know that our goal at CIDTHA is to work with you through any issues that may be at hand. If you have any questions, please do not hesitate to contact us at (208) 553-4321.

---

---

---

---

---

---

---

---

I went by your office today Friday May 16th, and found the doors to be locked, and your office closed until Monday? So I thought I better send you an e-mail today to make an official complaint against one of our neighbors. Cinderella Fagner who lives in the house across the street from me at 007.

I am sick and tired of these things happening in our neighborhood, if it's not drinking and selling drugs, it's domestic violence such as last night, which has all happened since Cinderella has been living in this house. How many complaints do you need to have them removed from our housing units? They have swindled around to keep the house within their family, and from what I understand that house is in Minnie Mouse's name now, which is Cinderella's grandmother - and Connie doesn't even live in the house, other than maybe every other weekend to come up here from her home in Lapland to play bingo out at our Casino. Please - do what you can to get them OUT !!!!! If there is anything else that I can do to help this process, please don't hesitate to contact me.

---

---

---

---

---

---

---

---

## Practice Reviewing and Writing Key A&O Policy Issues

SECTION 11

---

---

---

---

---

---

---

---

**Policy:** [What is the mission or standard that this SOP procedure must meet?]  
**PURPOSE: CINDERELLA'S FOR ADMITTING ESSENTIAL FAMILIES**

**Purpose:** [What is the rationale of this SOP procedure?]  
**Scope:** [What areas of the company are affected by this SOP procedure?]

**Responsibilities:**  
[Who is listed in this SOP procedure and what are they required to do?]  
[Who is listed in this procedure and what are they required to do?]  
[Who is listed in this procedure and what are they required to do?]  
**Definitions:** [What words are used in this procedure that readers may not understand?]  
[What other words are used that readers may not understand?]

**Procedure:**

**1.0 [FIRST PREPARATORY ACTIVITY - PLAN]**

1.1 [Who performs the first step of the activity and what do they do?]  
1.2 [Who performs the second step of the activity and what do they do?]  
[See...]

**2.0 [SECOND ACTIVITY - DO]**

2.1 [Who performs the first step of the activity and what do they do?]  
• [Use bullets to improve readability]  
• [Use bullets to improve readability]

2.2 [Who performs the second step of the activity and what do they do?]  
• [Use bullets to improve readability]  
• [Use bullets to improve readability]

[NOTE: create and key elements. What items are needed to capture what data?]  
[See...]

**3.0 [THIRD ACTIVITY - CHECK]**

3.1 [Who performs the first step of the activity and what do they do?]  
3.2 [Who performs the second step of the activity and what do they do?]  
• [Use bullets to improve readability]  
• [Use bullets to improve readability]

**4.0 [FOURTH ACTIVITY - ACT]**

4.1 [Who performs the first step of the activity and what do they do?]  
4.2 [Who performs the second step of the activity and what do they do?]  
4.3 [See...]

**5.0 [USE MORE ACTIVITIES AS NEEDED]**

5.1 [Who performs the first step of the activity and what do they do?]  
5.2 [Who performs the second step of the activity and what do they do?]

**Effectiveness Criteria:**

- [What measures communicate the procedure is working?]
- [What records are required to be completed?]

**References:**

**A. [STANDARD, LAW OR REGULATION]**  
Paraphrase what this standard, law or regulation says.

**B. [OTHER PROCEDURES, DOCUMENTS, RECORDS, ETC.]**  
Paraphrase what this reference is about.

---

---

---

---

---

---

---

---

### Process for Policy Development

- **Policy:** [What is the mission or standard that this SOP procedure must meet?]
  - **PROVIDE GUIDELINES FOR THE APPLICATION PROCESS**
- **Purpose:** [What is the rationale of this SOP procedure?]
- **Scope:** [What areas of the company are affected by this SOP procedure?]
- **Responsibilities:**
  - [Who is listed in this SOP procedure and what are they required to do?]
  - [Who else is listed in this procedure and what are they required to do?]
  - [Who else is listed in this procedure and what are they required to do?]
- **Definitions:** [What words are used in this procedure that readers may not understand?]
  - [What other words are used that readers may not understand?]

---

---

---

---

---

---

---

---

### Guidelines for Application

- **Policy:**
  - The so and so will allow 1 cat.
- **Purpose:**
  - To ensure seniors have company.
  -
- **Scope:**
- **Responsibility:**

---

---

---

---

---

---

---

---

### Procedure:

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]**
- 1.1 [Who performs the first step of the activity and what do they do?]
  2. [Who performs the second step of the activity and what do they do?]
  3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]**
1. [Who performs the first step of the activity and what do they do?]
    - [Use bullets to improve readability]
    - [Use bullets to improve readability]
  2. [Who performs the second step of the activity and what do they do?]
    - [Use bullets to improve readability]
    - [Use bullets to improve readability]
- [NOTE]: point out key elements. What forms are needed to capture what data?]
3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]**
- 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
- [Use bullets to improve readability]  
[Use bullets to improve readability]

---

---

---

---

---

---

---

---

### Guidelines for Incomplete Application

- Policy:
- Purpose:
- Scope:
- Responsibility:

---

---

---

---

---

---

---

---

### Procedure:

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]**
1. [Who performs the first step of the activity and what do they do?]
  2. [Who performs the second step of the activity and what do they do?]
  3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]**
1. [Who performs the first step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  2. [Who performs the second step of the activity and what do they do?]
  - (do takes to improve readability)
  - [NOTE: point out key elements. What forms are needed to capture what data?]
  3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]**
- 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
- (do takes to improve readability)  
(do takes to improve readability)

---

---

---

---

---

---

---

---

### Guidelines for Notification of Ineligibility

- Policy:
- Purpose:
- Scope:
- Responsibility:

---

---

---

---

---

---

---

---

**Procedure:**

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]
  - 1. [Who performs the first step of the activity and what do they do?]
  - 2. [Who performs the second step of the activity and what do they do?]
  - 3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]
  - 1. [Who performs the first step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - 2. [Who performs the second step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - [NOTE]: point out key elements. What forms are needed to capture what data?]
  - 3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]
  - 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]

---

---

---

---

---

---

---

---

**Guidelines for Determining Income**

- Policy:
- Purpose:
- Scope:
- Responsibility:

---

---

---

---

---

---

---

---

**Procedure:**

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]
  - 1. [Who performs the first step of the activity and what do they do?]
  - 2. [Who performs the second step of the activity and what do they do?]
  - 3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]
  - 1. [Who performs the first step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - 2. [Who performs the second step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - [NOTE]: point out key elements. What forms are needed to capture what data?]
  - 3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]
  - 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]

---

---

---

---

---

---

---

---

### Guidelines for Unauthorized Occupant

- Policy:
- Purpose:
- Scope:
- Responsibility:

---

---

---

---

---

---

---

---

### Procedure:

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]**
1. [Who performs the first step of the activity and what do they do?]
  2. [Who performs the second step of the activity and what do they do?]
  3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]**
1. [Who performs the first step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  2. [Who performs the second step of the activity and what do they do?]
  - (do takes to improve readability)
  - [NOTE: point out key elements. What forms are needed to capture what data?]
  3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]**
- 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
- (do takes to improve readability)  
(do takes to improve readability)

---

---

---

---

---

---

---

---

### Guidelines for Inspections

- Policy:
- Purpose:
- Scope:
- Responsibility:

---

---

---

---

---

---

---

---



**Procedure:**

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]
  - 1. [Who performs the first step of the activity and what do they do?]
  - 2. [Who performs the second step of the activity and what do they do?]
  - 3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]
  - 1. [Who performs the first step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - 2. [Who performs the second step of the activity and what do they do?]
  - (Use bullets to improve readability)
  - (Use bullets to improve readability)
  - [NOTE]: point out key elements. What forms are needed to capture what data?]
  - 3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]
  - 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
  - (Use bullets to improve readability)
  - (Use bullets to improve readability)

---

---

---

---

---

---

---

---

**Guidelines for Tenant Damage**

- Policy:
- Purpose:
- Scope:
- Responsibility:

---

---

---

---

---

---

---

---

**Procedure:**

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]
  - 1. [Who performs the first step of the activity and what do they do?]
  - 2. [Who performs the second step of the activity and what do they do?]
  - 3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]
  - 1. [Who performs the first step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - 2. [Who performs the second step of the activity and what do they do?]
  - (Use bullets to improve readability)
  - (Use bullets to improve readability)
  - [NOTE]: point out key elements. What forms are needed to capture what data?]
  - 3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]
  - 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
  - (Use bullets to improve readability)
  - (Use bullets to improve readability)

---

---

---

---

---

---

---

---

### Guidelines for Work Orders

- Policy:
- Purpose:
- Scope:
- Responsibility:

---

---

---

---

---

---

---

---

### Procedure:

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]**
1. [Who performs the first step of the activity and what do they do?]
  2. [Who performs the second step of the activity and what do they do?]
  3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]**
1. [Who performs the first step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  2. [Who performs the second step of the activity and what do they do?]
  - (do takes to improve readability)
  - [NOTE: point out key elements. What forms are needed to capture what data?]
  3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]**
- 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
- (do takes to improve readability)  
(do takes to improve readability)

---

---

---

---

---

---

---

---

### Guidelines for Abandonment

- Policy:
- Purpose:
- Scope:
- Responsibility:

---

---

---

---

---

---

---

---

**Procedure:**

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]
  - 1. [Who performs the first step of the activity and what do they do?]
  - 2. [Who performs the second step of the activity and what do they do?]
  - 3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]
  - 1. [Who performs the first step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - 2. [Who performs the second step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - [NOTE]: point out key elements. What forms are needed to capture what data?]
  - 3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]
  - 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]

---

---

---

---

---

---

---

---

**Guidelines for Collections**

- Policy:
- Purpose:
- Scope:
- Responsibility:

---

---

---

---

---

---

---

---

**Procedure:**

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]
  - 1. [Who performs the first step of the activity and what do they do?]
  - 2. [Who performs the second step of the activity and what do they do?]
  - 3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]
  - 1. [Who performs the first step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - 2. [Who performs the second step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - [NOTE]: point out key elements. What forms are needed to capture what data?]
  - 3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]
  - 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]

---

---

---

---

---

---

---

---

### Guidelines for Termination

- Policy:
- Purpose:
- Scope:
- Responsibility:

---

---

---

---

---

---

---

---

### Procedure:

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]
  1. [Who performs the first step of the activity and what do they do?]
  2. [Who performs the second step of the activity and what do they do?]
  3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]
  1. [Who performs the first step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  2. [Who performs the second step of the activity and what do they do?]
  - (do take to improve readability)
  - [NOTE: point out key elements. What forms are needed to capture what data?]
  3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]
  - 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
  - (do take to improve readability)
  - (do take to improve readability)

---

---

---

---

---

---

---

---

#### A. Application Process

- Families must submit a completed application in order for a review to determine apparent eligibility. If the applicant has a delinquent balance with the ANYIHA, other public entity, or the Tribe, the family must enter into a payback agreement prior to being considered for eligibility. Failure to do so will result in the family being ineligible to be placed on the waiting list.
- 1. In order to be considered for admission in any housing program offered by the ANYIHA, a written (legible) application must be completed.
- 2. All application data processed by ANYIHA staff are entered in an automated data program so it may be tracked.
- 3. Staff members receiving a fully completed application must date and time stamp it.
- 4. All information provided in the application will be immediately verified and documented when units are available and there are no applicants on the waiting list.
- 5. When there are no units available, a preliminary review for application completeness is performed for placement on the waiting list.
- 6. Applicants with incomplete applications will be notified and provided an opportunity to complete the application within a maximum of 60 days.
- 7. Incomplete applications are placed in the inactive file.
- 8. An applicant who knowingly completes a material misrepresentation during the application process and such is discovered prior to occupancy will be disqualified from consideration. Any material misrepresentation made during the application process and discovered after occupancy will result in immediate termination of housing assistance.

---

---

---

---

---

---

---

---

### Communications

**A. Notification of Eligibility**

1. Each eligible applicant shall be notified in writing of the following:
  - Notice of eligibility within thirty (30) days of the determination.
  - Notice of interview in person or by telephone.
  - If a dwelling unit is available for the family, provide notice of the following:
    1. Identifying the location, project number, and unit number;
    2. The number of bedrooms;
    3. The approximate date of availability of the unit;
    4. A statement that the applicant will be required to sign a lease agreement prior to occupancy, which will describe the family's duties and responsibilities;
    5. A statement that the notice is not a contract and does not mean that NCHFA is legally obligated to provide housing to the applicant; and
    6. A statement that the family will be required to attend housing counseling sessions.
- If a dwelling unit is not available for the family, a statement that the applicant will be placed on a waiting list and notified when a unit becomes available.
  1. Waiting list placement does not guarantee selection.
  2. As applicant information changes occur over time, it is the responsibility of the applicant to submit information to update their file.
  3. If the applicant fails to update information at least annually, they will be removed from the waiting list.

---

---

---

---

---

---

---

---

---

---

### Incomplete Application

The purpose of this letter is to inform you that after review of your waiting list file, your application for housing assistance is incomplete.

In order for your application to be complete, we need the following information submitted to our office no later than **March 27, 2008**.

- ✓ Copies of social security cards
- ✓ Current proof of income for all adults in the household.
- ✓ Signed IRS Form 4506 for all adult household members. (enclosed)

Please be advised that if we do not receive the necessary information by the above date, your housing assistance application may be in jeopardy and could possibly result in removal from the waiting list.

If you have any further questions, please feel free to contact our office at the number above.

---

---

---

---

---

---

---

---

---

---

### Guidelines for Complaints

- Policy:
- Purpose:
- Scope:
- Responsibility:

---

---

---

---

---

---

---

---

---

---

**Procedure:**

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]
  - 1. [Who performs the first step of the activity and what do they do?]
  - 2. [Who performs the second step of the activity and what do they do?]
  - 3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]
  - 1. [Who performs the first step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - 2. [Who performs the second step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - [NOTE]: point out key elements. What forms are needed to capture what data?]
  - 3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]
  - 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]

---

---

---

---

---

---

---

---

**Guidelines for Housing Counseling**

- Policy:
- Purpose:
- Scope:
- Responsibility:

---

---

---

---

---

---

---

---

**Procedure:**

- 1.0 [FIRST PREPARATORY ACTIVITY - PLAN]
  - 1. [Who performs the first step of the activity and what do they do?]
  - 2. [Who performs the second step of the activity and what do they do?]
  - 3. [etc...]
- 2.0 [SECOND ACTIVITY - DO]
  - 1. [Who performs the first step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - 2. [Who performs the second step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]
  - [NOTE]: point out key elements. What forms are needed to capture what data?]
  - 3. [etc...]
- 3.0 [THIRD ACTIVITY - CHECK]
  - 3.1 [Who performs the first step of the activity and what do they do?]
  - 3.2 [Who performs the second step of the activity and what do they do?]
  - [Use bullets to improve readability]
  - [Use bullets to improve readability]

---

---

---

---

---

---

---

---