“Inspiring Ideas in Indian Housing”

HUD ONAP

NATIONAL TRIBAL HOUSING SUMMIT

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SELF MONITORING

Washington, DC

In this presentation you will learn:

- What is Self-Monitoring
- Who Conducts Self-Monitoring
- Implementing Self-Monitoring
- Implementing Self-Monitoring Assessments
- Self-Monitoring Mutual Agreements

Self-Monitoring Regulations:

Section 403(b) of NAHASDA requires a recipient of IHBG funds to complete a self monitoring assessment at least annually. The recipient will assess compliance with the requirements of NAHASDA. The results of the review will be included in the Annual Performance Report (APR) submitted to HUD.

24 CFR 1000.502 requires the recipient to monitor grant activities to ensure compliance with applicable Federal requirements and monitoring performance goals under the IHP. The compliance assessment must be performed in accordance with Section 403(b) of NAHASDA.

Self-Monitoring Reporting Requirements:

A self-monitoring assessment is conducted, by funding recipients, through an organized system of internal controls that aim to assess compliance with NAHASDA requirements. This monitoring requirement includes conducting on-site inspections of units in accordance with your policy.

The results of the self-monitoring assessment should be reported in the Annual Performance report (APR).

Lastly, and if applicable, a single audit, under 2 CFR 200, is required to monitor compliance with federal grant terms.

Who Conducts Self-Monitoring?

Tribal Recipients

If the tribe is the IHBG recipient, it is responsible for monitoring grant activities to ensure compliance with applicable Federal requirements and monitoring performance under the Indian Housing Plan (IHP). Also, under 24 CFR §1000.502, the tribe is responsible for preparing and submitting to HUD:

1. An APR within 90 days of the end of the program year. Within the APR, IHBG recipients should report on their self-monitoring assessment in Section 10. This includes a description of 1). the self-monitoring systems and internal control procedures used; 2). the activities that were monitored, the results of each monitoring activity, and any required improvements/corrections to the recipient's operations, and 3). any monitoring activities conducted by the recipient's subrecipients.

2. A financial audit that complies with 2 CFR Part 200 audit within 9 months after the end of the TDHE's fiscal year, if applicable.

TDHE Recipients

If the recipient is a TDHE, the tribe (as the grant beneficiary), is still responsible for monitoring programmatic and compliance requirements of the IHP and NAHASDA. However, the TDHE would prepare periodic progress reports, including:

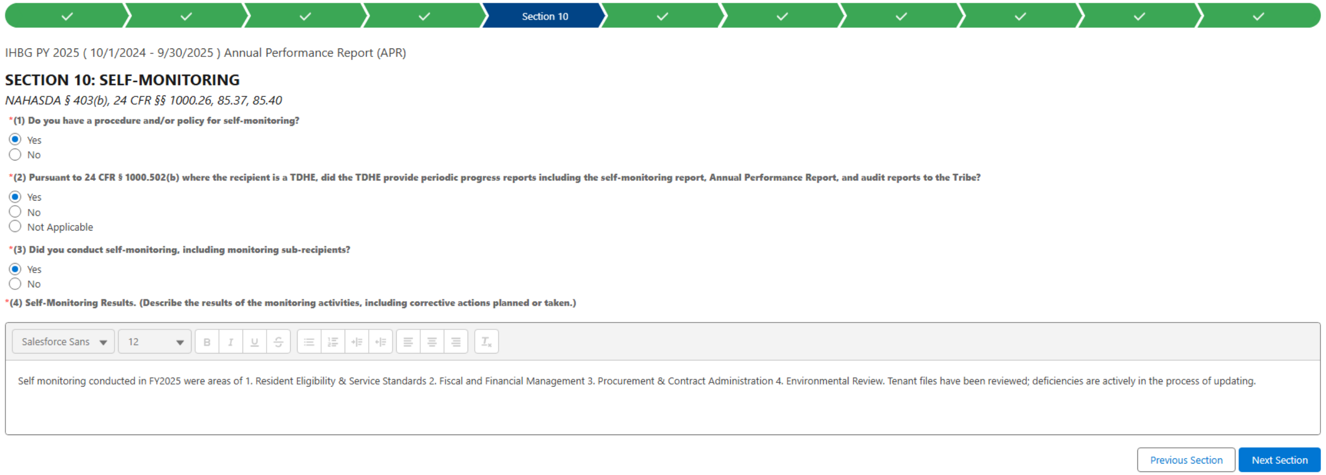
1. An APR within 90 days of the end of the program year that includes a description of its self-monitoring in Section 10 of the IHP/APR.

2. A financial audit that complies with 2 CFR Part 200 audit within 9 months after the end of the TDHE's fiscal year, if applicable.

3. The TDHE must provide the tribe with a copy of its self-monitoring assessments, APRs, and audits so that the tribe can carry out its oversight responsibilities under NAHASDA.

Reporting Self-Monitoring on the APR

- Self Monitoring is reported on Section 10 of the APR
- The description on the APR should have some details about the **process, deficiencies that were identified, and action plans for resolving the deficiencies**
- **What you report on self monitoring on your APR feeds into the risk assessment we use for monitoring**:
  - Vague self-monitoring results receives points
  - No self-monitoring done receives points



Implementing Self-Monitoring Assessment:

Recipients should develop a self-monitoring policy or practices as part of your organization's policies and procedures and then identify the activities that will be monitored. This is based on the recipient's proposed program activities outlined in the IHP and the overall operations of the organization.

ONAP provides IHBG recipients with sample monitoring plans that can be used to conduct self-monitoring. Use of these sample monitoring plans is optional; however, the plans are designed to provide tribes and TDHEs with an effective, structured approach to evaluate performance and determine compliance with program requirements.

After the recipient has monitored and tracked its activities, they prepare a summary of the results and implement corrective actions, if any.

ONAP Sample Self-Monitoring Plans

- IHP and APR Compliance Monitoring Plan
- Lead-Based Paint Monitoring Plan
- Environmental Review Compliance Monitoring Plan
- General Instructions to Monitoring Plans
- Labor Standards Monitoring Plan
- Maintenance and Inspection Monitoring Plan
- Organization and Structure Monitoring Plan
- Other Programs Monitoring Plans ICDBG ROSS
- Procurement and Contract Administration Monitoring Plan
- Relocation and Real Property Acquisition Monitoring Plan
- Section 504 Accessibility Monitoring Plan
- Self-Monitoring Plan
- Subrecipient Agreements Monitoring Plan
- Admissions and Occupancy Monitoring Plan
- Occupancy Review Form-Appendix 1
- Occupancy Tenant Files Review Forms-Appendix 2
- Financial and Fiscal Management Monitoring Plan
- Financial and Fiscal Management: Appendix 1 - Internal Controls
- Financial and Fiscal Management: Appendix 2 - Cash Management
- Financial and Fiscal Management: Appendix 3 - Indirect Costs Cost Allocation
- Financial and Fiscal Management: Appendix 4 - Reserve Balances
- Financial and Fiscal Management: Appendix 5 - TDCs
- Financial and Fiscal Management: Appendix 6 - Program Income
- Financial and Fiscal Management: Appendix 7 - Investments
- Financial and Fiscal Management: Appendix 8 - Insurance
- Title VI Monitoring Plan
- Tribal HUD VASH Monitoring Plan

Implementing the Self-Monitoring Assessment:

The first step in implementing the self-monitoring assessment is to determine who will perform the assessment review.

It is critical to conduct self-monitoring assessment with an objective and impartial perspective.

We recommend staff do not review their own work. For example, an individual whose duties focus on housing development might be a candidate for doing the assessment of financial practices; or a financial manager could assess environmental reviews.

Technical Assistance is available to assist with developing and implementing self-monitoring.

Here are some examples of the ways in which self-monitoring assessments can be conducted:

Example 1

Management Interviews:

An independent evaluator can complete the self-monitoring assessment by conducting one-on-one interviews with tribal housing program or TDHE managers to obtain their insights into how they adhere to specific compliance questions. Interviews with the organization's director, deputy directors, divisional or departmental managers would provide sufficient corroborating information for the evaluator to exercise his/her judgment in determining the consistency of and degree of adherence to internal controls and applicable regulatory requirements.

Example 2

Standard Operating Procedure Review:

Another approach to undertaking a self-monitoring assessment is to review the organization's standard operating procedures-codes of conduct, personnel policies, financial management, procurement, and construction contract policies and procedures to assess the existence and use of internal controls. To assess how well staff adhere to the established procedures, an evaluator can select a random sample of transaction files and determine whether the cases comply with the housing entity's customary operating practices. If all or most of the case files conform to the standard operating procedures, then the evaluator can reasonably reach a judgment on the entity's consistency in adhering to applicable requirements.

Example 3

Facilitated Sessions:

Another approach to undertaking the self-monitoring assessment is to convene a working session of IHBG recipient managers and program and/or administrative staff facilitated by an independent third party to talk through the monitoring topics as a group. Known as a self-assessment workshop, this approach has the added benefit of gaining everyone's input with open and frank communication. The role of the facilitator is to lead the group's discussion and bring the group to consensus on the appropriate response to compliance questions.

Self-Monitoring Take Aways

- Why? It’s the law! And it’s for your benefit.
- How? ONAP does not prescribe how you complete self-monitoring, there are many different ways
- Results: Identify areas of deficiencies and implement corrective actions
- Reporting: Report detailed description on your APR including the **process, deficiencies, and corrective actions**

Self-Monitoring Mutual Agreements

In an effort to promote effective self-monitoring in accordance with Section 403(b) of NAHASDA and the IHBG regulations at 24 CFR § 1000.502(a), ONAP offers recipients the opportunity to enter into Self-Monitoring Mutual Agreements (SMMAs). SMMAs are for recipients that have well-established systems, are interested in improving their self-monitoring efforts, and accept the terms of the SMMA. The benefit of entering into such an SMMA is ONAP's pledge to conduct on-site monitoring of the recipient less frequently. For more information, see Program Guidances 2007-08 and 2007-01 (ONAP). See example below:

Microsoft Word Document

Reference Materials:

- Guidance on Self-Monitoring: Self-Monitoring Guidebook (09/2018)
- The sample self-monitoring plans can be found here: http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/ih/grants/oversight.

Questions

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Thank you