

NORTHERN CHEYENNE TRIBAL HOUSING **AUTHORITY** **SELF - MONITORING** **POLICIES AND PROCEDURES**

These policies and procedures were adopted by the NCTHA Board of Commissioners by Resolution # 25- 2011 on August 15, 2011

Policy Statement

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

This policy is intended to establish an easy to use compliance assessment system that includes self-monitoring procedures to be used by the NCTHA as a management tool in operating the NCTHA as a property management business.

1. Conducting Compliance Assessments

a. Approaches

The NCTHA shall determine each year what approach to take in conducting self-monitoring compliance assessments in accordance with this Policy. The Executive Director shall assure that the assessments are conducted with an objective and impartial perspective and that no one is reviewing their own work. The approaches that may be used to conduct the compliance assessments include, but are not limited to, the following:

1. Develop a Housing Assessment Committee comprised of staff, members of the Board of Commissioners and/or Tribal Council.
2. Procure the services of an outside third party who has the technical knowledge and experience in the areas being assessed.

b. Methods

The Executive Director shall work with the compliance assessor(s) to determine the most effective method, or combination of methods, to utilize in conducting the self-monitoring compliance assessments in accordance with this policy. Conducting the compliance assessments may be achieved through the following methods:

1. Interviews with managers and/or program administrators. The assessor shall complete the self-monitoring checklists that are included as an Appendix to this Policy by

conducting one-on-one interviews with the respective managers or administrative personnel to obtain their insights into how they adhere to specific compliance questions. The assessor shall gather a sufficient amount of corroborating information to exercise his/her judgment in determining the consistency and degree of adherence to the applicable regulatory requirements.

2. Facilitated sessions. An independent third-party shall act as a facilitator and conduct self-assessment workshops with the managers and administrative staff to talk through the monitoring checklist questions as a group. The role of the facilitator shall be to lead the group's discussion and bring the group to consensus on the appropriate response to compliance questions.
3. Standard Operating Procedures Review. The assessor shall review the NCTHA's standard operating procedures including all of the policies and governing documents required by NAHASDA, as well as, the NCTHA's contracts and established internal controls. The assessor shall analyze how well the staff adheres to the adopted policies and procedures. The assessor shall also select a random sample of transaction files and determine whether the documentation included and recorded in the files conform to established operating procedures. The assessor shall compile and analyze the information and answer the compliance questions on the checklist.

2. Monitoring Strategy and Plan

1. The NCTHA Executive Director shall develop and complete a Monitoring Plan each plan year, encompassing the following items:
 - a. the self-monitoring compliance assessments start and completion dates.
 - b. approach to take to conduct and complete the different compliance assessments as described in Section 1.a.
 - c. frequency of conducting and completing the compliance assessments (annually, semi-annually, quarterly)
 - d. procedures to resolve any identified deficiencies or concerns
2. The NCTHA Executive Director shall provide a copy of the Monitoring Strategy and Plan to all staff and to the NCTHA Board of Commissioners. Any amended plans will be distributed to the same individuals.
3. The criteria used in the evaluations may be amended by the Executive Director due to changes in applicable laws and regulations.

3. Areas to be Monitored for Compliance

a. List of areas

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

b. Additions to List

The Executive Director may add any additional areas to the list as recommended by the NCTHA Board of Commissioners, Tribal Council or any HUD notices, guidance's, or guidebooks.

4. Resolution of Noncompliance Areas and Issues

a. Recommendations

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

b. Oversight responsibility

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

5. Reporting

The self-monitoring compliance checklist is not required to be submitted with the APR; however, a summary of the self-monitoring activities shall be included, along with the appropriate required responses on the APR form to demonstrate that the NCTHA is in compliance with 24CFR § 1000.502.

Appendix A

Recommendations for Improvement Plan Template

Appendix B

Self-Monitoring Compliance Checklist

***NORTHERN CHEYENNE
TRIBAL HOUSING
AUTHORITY***

***SELF-MONITORING
COMPLIANCE
ASSESSMENT***

Evaluation A

Planning

Completed by:

Date:

The Native American Housing Assistance and Self-Determination Act of 1996, requires the NCTHA to submit Indian Housing Plans (IHP) in order to receive formula funding under the Indian Housing Block Grant (IHBG) Program. The Indian Housing Plan (IHP) consists of two main parts: the Five Year Plan and the One Year Plan. The Five Year Plan consists of a Mission Statement, Goals and Objectives and an Activities Plan. The One Year Plan contains more information than the Five Year Plan, including six sections and three data tables

1. Five Year Plan

a. Mission Statement

Is the language of the NCTHA Mission Statement being addressed and low-income families in the jurisdiction of the Tribe being served? YES ___ NO ___

b. Goals and Objectives

Is progress being made in addressing the goals and objectives contained in the Five Year Plan? YES ___ NO ___

Are the quantitative goals and objectives being met or on schedule? YES ___ NO ___

c. Activities Plan

Have the activities described in the NCTHA IHP been accomplished by the prescribed date? YES ___ NO ___

2. One Year Plan

a. Goals and Objectives

Are the goals and objectives described in the NCTHA IHP being accomplished as described? YES ___ NO ___

b. Performance Objectives

Are the performance objectives described in the NCTHA IHP adequately defined to determine the progress made in this NCTHA plan year? YES ___ NO ___

c. Statement of Needs

Has the estimate for low-income Indian families remained the same? YES ___ NO ___

d. Financial Resources

Are the financial resources stated in the Plan still available? YES ___ NO ___

e. Coordination of Government Agencies

Has there been coordination of implementation of NAHASDA activities with other governmental agencies as described in the NCTHA IHP? YES ___ NO ___

f. Coordination with Welfare Agencies

Has the NCTHA initiated partnerships and/or contacts with welfare agencies as described in the NCTHA IHP? **YES ___ NO ___**

g. Resident Safety and Involvement

Have actions been taken to insure the participation of residents in safety and affordable housing activities as described in the NCTHA IHP? **YES ___ NO ___**

h. 1937 Housing Act Units

Have actions been taken to ensure proper maintenance and operation of 1937 Act Housing units as described in the NCTHA IHP? **YES ___ NO ___**

i. Modernization Activities

Has the NCTHA made progress made on modernization programs described in the NCTHA IHP. **YES ___ NO ___**

j. Organizational Capacity

Is staffing adequate to support the activities described in the IHP? **YES ___ NO ___**

3. Certifications

Is the NCTHA in compliance with certifications described and included in the IHP? **YES ___ NO ___**

4. Cooperation Agreements

If required by 24 CFR 1000.240, has the local cooperation agreement with the governing body of the locality been executed? **YES ___ NO ___**

5. Environmental Activities

a. Have the environmental effects of each NCTHA IHBG activity been evaluated in accordance with the provisions of the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. 4321) and other related authorities identified under the HUD implementing regulations at 24 CFR parts 58? **YES ___ NO ___**

b. Has a separate Environmental Review Record (ERR) been completed for each project? **YES ___ NO ___**

c. Was the applicable HUD recommended format used for the ERR? **YES ___ NO ___**

d. Does each ERR contain the following:

- Project description including geographic boundaries and all related HUD funded activities proposed? **YES ___ NO ___**

- Written determinations in those cases in which the NCTHA claims that projects or activities are "exempt" under 24 CFR 58.34 or "categorically excluded" under 24 CFR 58.35? **YES ___ NO ___**

- Finding of No Significant Impact (FONSI)? **YES ___ NO ___**

- Copy of published Notice of FONSI or a Combined Notice? **YES ___ NO ___**

- Copy of published of Notice of Intent or Request Release of Funds (NOI/RROF) or a Combined Notice of FONSI and NOI/RROF? **YES ___ NO ___**
- Form HUD 7015.15, Request for Release of Funds and Certification? **YES ___ NO ___**
- HUD form 7015.16, Notice of Removal of Grant Conditions signed and dated by HUD, indicating that at least 15 days were allowed for objections? **YES ___ NO ___**
- e. Do NCTHA records show that:
 - With the exception of exempt activities, no IHBG funds were obligated or spent prior to the receipt of the HUD 7015.16 form? **YES ___ NO ___**
 - With the exception of categorically excluded activities determined to be exempt under the provisions of 24 CFR 58.34(a)(12), no physical development activities began prior to the receipt of the HUD 7015.16 form? **YES ___ NO ___**
- f. Is there evidence that the Federal laws and authorities listed at 24 CFR 58.5 have been specifically addressed for all activities except for those classified as exempt under 24 CFR 58.34? **YES ___ NO ___**
- g. Were recognized authoritative sources used to support the conclusions reached? **YES ___ NO ___**
- h. If mitigating measures are required, are they included in the ERR as part of the actions pertaining to the environmental review? **YES ___ NO ___**
- i. If the NCTHA determined that an Environmental Impact Statement (EIS) was required for a project, does the ERR contain:
 - Copy of a published Notice of Intent to Prepare an EIS? **YES ___ NO ___ N/A ___**
 - Evidence that a copy of such notice was sent to local news media, interested individuals and groups, local, State and Federal agencies, including the regional office of the EPA? **YES ___ NO ___ N/A ___**
 - Evidence that copies of the Draft EIS were sent to the EPA, other Federal agencies, State and local agencies, any entity designated by a State pursuant to E.O. 12372, and interested individuals and groups? **YES ___ NO ___ N/A ___**
 - Evidence that the comments were responded to in the final EIS? **YES ___ NO ___ N/A ___**
 - Evidence that the Draft and Final EISs were filed for Federal Register publication with the EPA for the required time periods before the NCTHA submitted the Request for Release of Funds? **YES ___ NO ___ N/A ___**

Evaluation B

Organization, Management, and Personnel

Completed by:

Date:

The NCTHA's efficient management operation enables the NCTHA to meet its fundamental objective of serving the tribal members in its service area. The Executive Director leads the NCTHA management operation that involves:

- coordinating the activities of all of the departments;
- leading the NCTHA management team;
- regulating internal operations;
- generating and allocating resources;
- establishing objectives and monitoring their fulfillment;
- maintaining positive relationships with other governmental entities and the public at large;

1. Organization

- a. Are files maintained for each NCTHA Commissioner and do they include appointments and oaths of office? **YES ___ NO ___**
- b. Are NCTHA Board meetings held in accordance with the Bylaws? **YES ___ NO ___**
- c. Are NCTHA Board resolutions properly bound and indexed? **YES ___ NO ___**
- d. Are NCTHA Board members provided financial statements regularly **YES ___ NO ___**

2. Files Management

- a. Is a uniform filing system adequate and maintained by all NCTHA management staff? **YES ___ NO ___**
- b. Is a copy of the NAHASDA, the Final Rule (24 CFR 1000), HUD Notices, Guidance Bulletins, and other HUD correspondence maintained in a manner that facilitates use by staff? **YES ___ NO ___**
- c. Is proper disposition made of old records in accordance with established policies and procedures? **YES ___ NO ___**
- d. Are NCTHA Board-adopted Policies maintained and available to all management staff? **YES ___ NO ___**
- e. Is the NCTHA correspondence log properly maintained and letters responded to in a timely manner? **YES ___ NO ___**

3. Organization and Staffing

- a. Are position descriptions current and accurate? YES ___ NO ___
- b. Is there proper delegation of authority and responsibility? YES ___ NO ___
- c. Are staff performance appraisals up-to-date? YES ___ NO ___

4. Personnel Policies

- a. Is documentation on salary comparability being maintained? YES ___ NO ___
- b. Are annual and sick leave practices in accordance with the NCTHA Board adopted Personnel Policy? YES ___ NO ___
- c. Are travel reimbursements made in accordance with NCTHA Board-adopted policies? YES ___ NO ___
- d. Is compliance to the federally required "Drug Free Workplace Act being monitored? YES ___ NO ___

5. Insurance

- a. Is an insurance register maintained listing all required insurance and termination dates? YES ___ NO ___
- b. Which of the following types of insurance are in effect protecting the NCTHA's assets?
 - 1. Property Insurance YES ___ NO ___ N/A ___
 - 2. Replacement (fire, wind, etc.) YES ___ NO ___ N/A ___
 - 3. Flood insurance YES ___ NO ___ N/A ___
 - 4. Liability and collision on vehicles YES ___ NO ___ N/A ___
 - 5. Liability YES ___ NO ___ N/A ___
 - 6. Workman's Compensation YES ___ NO ___ N/A ___
 - 7. Larceny, theft, burglary YES ___ NO ___ N/A ___
 - 8. Fidelity YES ___ NO ___ N/A ___
 - 9. Builder's risk Insurance YES ___ NO ___ N/A ___
 - 10. Other _____

Evaluation C

Financial and Fiscal Management Evaluation

Completed by:

Date:

The review of the NCTHA's financial and fiscal management systems and procedures is intended to assure compliance with the following:

- applicable administrative requirements under NAHASDA as set forth at 24 CFR 1000.26;
- applicable provisions of 24 CFR part 85, Uniform Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments;
- OMB requirements set forth in Circulars A-87 and A-133.

The scope of the NCTHA financial department includes reporting, funding drawdown, accounting records, internal cash management controls, budget control, investments and audits.

1. Reporting

- a. Are required Federal Cash Transaction Reports (SF425) submitted in a timely manner? YES ___ NO ___
- b. Have any letters been received from funding agencies regarding the accuracy of the reports submitted? YES ___ NO ___
- c. Has the NCTHA been denied access in LOCCS because of late reporting? YES ___ NO ___

2. Funding Drawdowns

- a. Does the NCTHA deliver or send checks for payment of IHBG program costs within 3 days of the deposit of such funds? YES ___ NO ___
- b. Has HUD required the remission of funds due to excessive drawdowns? YES ___ NO ___
- c. Are NCTHA Request Vouchers for IHBG payment:
1. Prepared accurately? YES ___ NO ___
 2. Documented properly? YES ___ NO ___
- d. Are the established NCTHA financial policies and procedures for requesting IHBG funding being followed? YES ___ NO ___

3. Accounting Records

a. Do the NCTHA accounting records adequately identify the source and application of funds provided in the following areas?

- 1. obligations YES ___ NO ___
- 2. unobligated balances YES ___ NO ___
- 3. assets YES ___ NO ___
- 4. liabilities YES ___ NO ___
- 5. outlays/expenditures YES ___ NO ___
- 6. income YES ___ NO ___

b. Are NCTHA cash receipts and cash disbursement journals current and accurate? YES ___ NO ___

c. Are bank statements reconciled monthly and in a timely manner? YES ___ NO ___

d. Are discrepancies noted in bank reconciliation? YES ___ NO ___

e. If discrepancies exist, are they investigated and resolved? YES ___ NO ___

4. Internal Cash Management Controls

a. Cash Receipts

1. If staff handling cash transactions have been replaced within the last 6 months, were appropriate security measures taken regarding former employees; e.g., LOCCS authority, safe combinations? YES ___ NO ___ N/A ___

2. Is there adequate separation of responsibility in the receipt recording and deposit of cash receipts? YES ___ NO ___

3. Are all checks received immediately stamped "For deposit only"? YES ___ NO ___

4. Are all checks, money orders and cash received immediately placed in a secure fireproof file or cash drawer upon receipt? YES ___ NO ___

5. Are receipts completed and recorded immediately upon receipt of cash, checks, or money orders? YES ___ NO ___

6. Are all funds deposited in accordance with the NCTHA financial management policies and procedures? YES ___ NO ___

7. Are cash receipts reconciled daily with the deposit slips in accordance with the NCTHA's financial management policy? YES ___ NO ___

8. Are cash receipts reconciled with the deposit slips by someone other than the NCTHA employee recording cash receipts and making deposits? YES ___ NO ___

9. Are there no NCTHA employee IOU notes or personal checks for cash exclusive of cash receipts for legitimate housing payments? YES ___ NO ___

b. Cash Disbursements

1. Is NAHASDA "program income" disbursed on affordable housing activities or invested properly? YES ___ NO ___

2. Is there adequate separation of duties in the authorization, recording and payment of cash disbursements in accordance with the NCTHA financial management policy? YES ___ NO ___

3. Are all expenditures supported by invoices, contracts, or purchase orders? YES ___ NO ___

4. Are all direct salaries and wages paid to NCTHA employees supported by time cards or sign-in sheets? YES ___ NO ___

5. Do time distribution records support all direct salaries that are prorated? YES ___ NO ___

6. Are checks for payment being processed and issued in accordance with the NCTHA Financial Management Policy? YES ___ NO ___

7. Are missing, voided or altered checks recorded and processed in accordance with the NCTHA Financial Management Policy? YES ___ NO ___

8. Are NCTHA unused checks kept in a safe and secure location such as a fireproof file or safe? YES ___ NO ___

c. Budget Control

1. Do NCTHA accounting records allow and provide for the comparison of actual expenditures with budgeted amounts for each grant? YES ___ NO ___

2. Does the NCTHA staff periodically (at least once a quarter) compare actual to budgeted expenditures? YES ___ NO ___

3. Do NCTHA accounting records include tracking of expended/unexpended and obligated/unobligated balances? YES ___ NO ___

4. Are NCTHA program budgets revised and approved, when necessary, in accordance with program requirements? YES ___ NO ___

d. Investments and Banking

1. Are NCTHA IHBG funds in one or more accounts separate from other funds? YES ___ NO ___

2. Are NCTHA accounts insured by an agency or instrumentality of the U.S. or fully collateralized to ensure protection of the funds even in the event of bank failure? YES ___ NO ___
3. Are NCTHA accounts subject to an agreement in a form allowing HUD to exercise its rights under 24 CFR 1000.60? YES ___ NO ___
4. Is cash in excess of immediate need identified and invested? YES ___ NO ___
5. Are NCTHA IHBG funds invested in instruments or obligations which meet the requirements of 24 CFR 1000.58(a)? YES ___ NO ___

e. Audits

1. Has an audit required under the Single Audit Act, as regulated by OMB Circular A-133, been performed? YES ___ NO ___
2. Was the audit completed within the time frames set forth in OMB Circular A-133? YES ___ NO ___
3. Has the NCTHA Annual Performance Report been submitted to HUD? YES ___ NO ___
4. Was the APR submitted to HUD on time? YES ___ NO ___
5. Were there HUD recommendations for improvements on the APR? YES ___ NO ___
6. Have any audit deficiencies identified in the report related to the IHBG program been adequately addressed within the prescribed time period? YES ___ NO ___
7. Has the NCTHA Board been informed of any audit deficiencies? YES ___ NO ___

f. Cost Allowability

1. Are costs being allocated in compliance with OMB Circular A-87, 24 CFR 85.22 and 24 CFR PART 1000 using the following guidance? YES ___ NO ___
2. Are expenditures in the following categories necessary and reasonable for proper and efficient administration of the program?
 - salaries and related costs? YES ___ NO ___
 - administrative service contracts (legal, account, audit, consulting)? YES ___ NO ___
 - travel expenditures? YES ___ NO ___
 - other administrative costs? YES ___ NO ___
3. Does a review of program expenditures reveal compliance with rules regarding unallowable costs as addressed in Attachment A of OMB Circular A-87, or identified in attachment B of that circular, including in the areas of:

- entertainment? YES ___ NO ___
 - contributions and donations? YES ___ NO ___
 - fines and penalties? YES ___ NO ___
 - general NCTHA expenditures including salary and expenses of staff and Commissioners? YES ___ NO ___
 - political activities YES ___ NO ___
4. Are costs charged to the NCTHA IHBG program allocable to the program and not included as a cost of any other Federally financed program in either the current or prior period? YES ___ NO ___
5. Is the percentage of NCTHA IHBG funds being used for administrative costs different than what is stated in the NCTHA IHP? YES ___ NO ___
6. Are all NCTHA IHBG funds being spent or obligated for NAHASDA affordable housing activities as defined in section 202 of the Act? YES ___ NO ___

Evaluation D

Supply Management and Contract Administration Evaluation

Completed by:

Date:

1. Procurement

- a. Is the NCTHA procuring materials, supplies, equipment and services in compliance with the NCTHA Supply Management Policy? YES ___ NO ___
- b. Is the NCTHA's Supply Management Policy in compliance with applicable portions of 24 CFR Part 85? YES ___ NO ___
- c. Regarding small purchases, are an adequate number of price or rate quotations on file from qualified sources for procurements of \$100,000 or less? YES ___ NO ___
- d. Regarding Competitive Sealed Bids (Formal Advertising), are the following activities being performed in accordance with the NCTHA Supply Management Policy:
1. Does the NCTHA staff receive at least two responsive bids from responsible bidders for each procurement transaction? YES ___ NO ___
 2. Does the procurement lend itself to a firm, fixed price contract and could selection of the successful bidder be made principally on the basis of price? YES ___ NO ___
 3. Does the NCTHA staff advertise the Invitation For Bid (IFB) in a publication of general circulation? YES ___ NO ___
 4. Are bids solicited from an adequate number of potential bidders? YES ___ NO ___
 5. Does the IFB, including specifications and pertinent attachments, clearly define the items or services needed in order for the bidders to properly respond to the invitation? YES ___ NO ___
 6. Does the IFB include wage determination schedules, payroll submission requirements, and other necessary bid elements? YES ___ NO ___
 7. Are all bids opened publicly at the time and place stated in the IFB? YES ___ NO ___
 8. Are all contracts awarded to the lowest responsive and responsible bidder? YES ___ NO ___
- e. Regarding competitive proposals, are the following activities being performed in accordance with the NCTHA Supply Management Policy:
1. Is this procurement method utilized only when conditions were not appropriate for the use of competitive sealed bids? YES ___ NO ___

2. Do the Request for Proposals (RFP) state clearly and accurately the technical requirements for the goods or services to be procured? **YES ___ NO ___**
3. Are the proposals solicited from an adequate number of qualified sources, consistent with the nature of the procurement? **YES ___ NO ___**
4. Do the RFPs identify all significant evaluation factors, including price or cost where required, and their relative importance? **YES ___ NO ___**
5. Does the NCTHA staff conduct technical evaluations of submitted proposals? **YES ___ NO ___**
6. Does the NCTHA make awards to the most responsive and responsible offerors whose proposals would be most advantageous to the NCTHA after price and other factors are considered? **YES ___ NO ___**
7. If proposals involving architectural/engineering professional services were evaluated with respect to factors other than price, did staff document the basis for negotiation of fair and reasonable compensation? **YES ___ NO ___**
- f. Regarding noncompetitive proposals, does the NCTHA staff show that another method of procurement (small purchases, sealed bids or competitive proposals) was not feasible because:
- the item or service was only available from a single source;
 - a public exigency or emergency was of such urgency to not permit use of competitive solicitation;
 - after solicitation of a number of sources, competition was determined inadequate?
- YES ___ NO ___**
- g. Is the NCTHA staff ensuring that its awards are not made to any party which is debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in the covered transaction consistent with the requirements of 24 CFR part 24? **YES ___ NO ___**
- h. Is contract pricing always based on a method other than the "cost-plus-a-percentage-of-cost" method? **YES ___ NO ___**
- i. Is the NCTHA processing purchase orders in compliance with the purchase order procedures described in the NCTHA's Supply Management Policy? **YES ___ NO ___**
- j. Are vendors paid in a timely manner once requested orders have been delivered, inspected, and accepted and payment of the vendor has been approved? **YES ___ NO ___**
- k. Are the contract provisions listed in 24 CFR 85.36(i) appropriately included in IHBG assisted contracts? **YES ___ NO ___**

- l. If contracts have been awarded for construction or facility improvements under the IHBG program(s), did the NCTHA staff:
- follow its own requirements relating to bid guarantees, performance bonds and payment bonds for construction contracts or subcontracts valued at or below \$100,000?
YES ___ NO ___
 - meet the minimum Federal requirements for bid guarantees, performance bonds and payment bonds (24 CFR 85.36(h)) or the alternatives set forth in 24CFR 1000.26(a)12) for construction contracts or subcontracts valued above \$100,000?
YES ___ NO ___
- m. Is the NCTHA taking affirmative steps to use small, minority-owned and women-owned businesses in grant funded contracts in accordance with 24 CFR 85.36?
YES ___ NO ___
- n. As required under Section 3 of the Housing and Urban Development Act of 1968, does the NCTHA attempt, to the greatest extent feasible consistent with Indian Preference requirements, to award contracts for work to be performed under the IHBG programs to business concerns which provide economic opportunities to low and very-low income persons who are residents of public housing or who live in the metropolitan or non-metropolitan count in which the programs are undertaken?
YES ___ NO ___

2. Inventory controls

- a. Does the NCTHA maintain its inventory of supplies, materials, and equipment in compliance with the adopted inventory control policies and procedures?
YES ___ NO ___
- b. Are the NCTHA employees responsible for inventory management qualified and capable of fulfilling their responsibilities?
YES ___ NO ___
- c. Do the NCTHA inventory control policies establish procedures to prevent the chance of theft, fraud or loss of NCTHA property?
YES ___ NO ___
- d. Is there adequate coordination between the NCTHA employees responsible for inventory control and the financial department to assure that the inventory of tools, supplies, materials and equipment is maintained in a cost effective and efficient manner?
YES ___ NO ___
- e. Does another NCTHA employee not responsible for maintaining the list of inventory periodically check the NCTHA list of property for accuracy?
YES ___ NO ___

3. Labor standards

- a. Is the NCTHA complying with the IHBG requirements found at 24 CFR 1000.16?
YES ___ NO ___
- b. Does the NCTHA maintain labor standards enforcement files for each construction project?
YES ___ NO ___

- c. Do NCTHA contract bid specifications contain labor standards provisions? YES ___ NO ___
- d. Does the NCTHA maintain records of employee interviews? YES ___ NO ___
- e. Are all payroll records certified by the NCTHA? YES ___ NO ___
- f. Are Semi-annual Labor Standards Enforcement Reports submitted to the regional HUD Labor relations office? YES ___ NO ___

4. Contract Labor Components

- a. Are the following documents included in contract files?
- Proper wage decision in contract/specifications YES ___ NO ___
 - Labor standards provisions in the contract specifications YES ___ NO ___
 - Davis-Bacon wage rates YES ___ NO ___
 - Additional classifications and wage rates processed as needed YES ___ NO ___
- b. Do contractors submit payrolls in a timely manner? YES ___ NO ___
- c. Are payrolls signed by employer or authorized representative? YES ___ NO ___
- d. Are payroll discrepancies/violations followed through to full resolution? YES ___ NO ___

5. Labor Investigations and Enforcement

- a. Are worker complaints handled and resolved in a timely manner, and investigations conducted where appropriate? YES ___ NO ___
- b. Are escrow accounts established and funds withheld to cover labor standards violations? YES ___ NO ___
- c. Are enforcement reports submitted to HUD where underpayments total \$1,000 or more? YES ___ NO ___

Evaluation E

Housing Management Evaluation

Completed by:

Date:

1. Policies and procedures

a. Does the NCTHA have the following policies in place as required by NAHASDA?

- Eligibility, Admissions and Occupancy YES ___ NO ___
- Rent and Homebuyer Payment and Collection YES ___ NO ___
- Maintenance YES ___ NO ___
- Management YES ___ NO ___

2. Eligibility

a. Are the most current HUD-determined income limits being utilized? YES ___ NO ___

b. Are only low-income Native American families determined eligible? YES ___ NO ___

c. Is eligibility determined in accordance with the NCTHA Admissions and Occupancy Policy?
YES ___ NO ___

d. Is the NCTHA Waiting list adequately maintained? YES ___ NO ___

e. Are applicants determined to be "ineligible" notified of reasons and options available to them?
YES ___ NO ___

3. Selection of families for housing assistance

a. Is the admission of selected participants being performed in accordance with the NCTHA Admissions and Occupancy Policy? YES ___ NO ___

b. Are incomes verified to be within the established income limits prior to execution of a Dwelling Lease of Homebuyer Agreement? YES ___ NO ___

c. Are all contracts for housing assistance between the NCTHA and the participant signed and dated and in their file? YES ___ NO ___

d. Are selected participants informed of their responsibilities prior to moving in? YES ___ NO ___

4. Rent and Homebuyer payment determinations

- a. Are payments calculated according to NCTHA Policy requirements? YES ___ NO ___
- b. Are all participants paying 30% or less of their adjusted income for their housing assistance? YES ___ NO ___
- c. Are verifications of income properly documented in participant files? YES ___ NO ___

5. Collections

- a. Are provisions of the NCTHA Collection and Eviction Policy being enforced? YES ___ NO ___
- b. Are delinquent notices sent out consistently each month? YES ___ NO ___
- c. Has the current balance for delinquencies decreased within the last six months? YES ___ NO ___
- d. Are payment agreements with NCTHA tenants and homebuyers being monitored for compliance? YES ___ NO ___
- e. Are delinquent tenants and homebuyers being referred to financial counseling? YES ___ NO ___

6. Maintenance and Inspections

- a. Are all participant files properly documented in accordance with the NCTHA Maintenance Policy? YES ___ NO ___
- b. Are Maintenance Policy standards for the type, cost-effectiveness and cost of rehabilitating a home being followed? YES ___ NO ___
- c. Are inspections of applicant units for rehabilitation fully completed and documented in files? YES ___ NO ___
- d. Is the Scope of Work for units to be rehabilitated completed in compliance with the NCTHA work order procedures and within budget and timeframes? YES ___ NO ___
- e. Are there procedures for follow-up on rehabilitation work completed to ensure quality workmanship? YES ___ NO ___