PROGRAM GUIDANCE

PROGRAM: Indian Housing Block Grant and Other HUD Programs

FOR: Tribal Government Leaders and Tribally Designated Housing Entities

~~RJBJ~~

FROM: Rodger J. Boyd, Deputy Assistant Secretary for Native American Programs, PN

TOPIC: Monitoring Plans for Recipients

PURPOSE: The purpose of this guidance is to inform Indian Housing Block Grant (IHBG) recipients about the availability of sample monitoring plans that they may use when conducting self-monitoring, as required under the Native American Housing Assistance and Self-Determination Act (NAHASDA).

Use of these sample monitoring plans is optional; however, the plans are designed to provide tribes and tribally designated housing entities (TDHE) with an effective, structured approach to evaluate performance and determine compliance with program requirements.

The sample monitoring plans can also be used to conduct similar reviews of the Indian Community Development Block Grant (ICDBG), Rural Housing and Economic Development/Rural Innovation Fund (RHED/RIF), and Resident Opportunity and Self-Sufficiency (ROSS) programs.

BACKGROUND: Section 403(b) of NAHASDA and its implementing regulations at 24 CFR § 1000.502(a) requires a recipient of IHBG funds to complete an annual self-monitoring assessment to ensure:

- compliance with IHBG and other applicable Federal requirements, and
- performance and progress in implementing the Indian Housing Plan (IHP).

If the recipient is a TDHE, 24 CFR § 1000.502(b) states that the tribe, as grant beneficiary, is responsible for monitoring the TDHE for compliance with all program requirements of the IHP and NAHASDA. The TDHE is required to submit to the tribe periodic progress reports, the annual self-monitoring assessment, the Annual Performance Report, and audit reports. The recipient of IHBG funding, whether a TDHE or a tribe, also is responsible for monitoring its subrecipients, if applicable, to ensure subrecipient compliance with applicable federal requirements and written contracts or agreements.

Self-monitoring is not a requirement for the ICDBG, RHED/RIF, or ROSS programs, but the Office of Native American Programs (ONAP) strongly encourages it. Self-monitoring of these programs provides information critical for a recipient to make informed judgments about program effectiveness, management efficiency, and compliance with applicable laws and regulations. It also helps identify instances of fraud, waste, and abuse.

ONAP currently uses monitoring plans when it conducts on-site or remote monitoring reviews of tribes/TDHEs. The monitoring plans now available to recipients are similar to those used by ONAP. By using the same basic monitoring plans, tribes/TDHEs will know how ONAP will conduct its monitoring and what it will be reviewing. Tribes/TDHEs that incorporate the monitoring plans in their self-monitoring program and conduct effective self-monitoring assessments each year are likely to have fewer findings and concerns when ONAP conducts its review.

By having a well-established self-monitoring system and the demonstrated capacity to administer the IHBG program, the tribe/TDHE has the opportunity to enter into a Self-Monitoring Mutual Agreement (SMMA) with ONAP, which would reduce the frequency of ONAP's on-site monitoring. See Program Guidance 2007-08 (Recipient Self-Monitoring) for more information on SMMAs. The Program Guidance is available at:
http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_8176.pdf.

PROCEDURE: The sample monitoring plans allow the reviewer to determine what types of data to collect, what questions to ask, and what documentation to examine when conducting a review. The reviewer should select the appropriate monitoring plans according to the activities described in the recipient's IHP, as well as any problems identified in previous HUD monitoring reports and/or Office of Management and Budget Circular A-133 audits.

The reviewer may not need to use every sample monitoring plan or address every topic/question in a plan when conducting self-monitoring. However, ONAP recommends that the reviewer always use the sample monitoring plans posted on the website. ONAP will routinely update the plans as needed, and will post the latest versions. The sample monitoring plans are listed below.

- GENERAL INSTRUCTIONS to Monitoring Plans
- APR and IHP Monitoring Plan
- Environmental Monitoring Plan
- Financial and Fiscal Management Monitoring Plan and Appendices
- Labor Standards Monitoring Plan
- Lead-Based Paint Monitoring Plan
- Maintenance and Inspection Monitoring Plan
- Occupancy Monitoring Plan and Occupancy Tenant Files Review Forms
- Organization and Structure Monitoring Plan
- Other Programs Monitoring Plans ICDBG ROSS RHED/RIF
- Procurement and Contract Administration Monitoring Plan
- Relocation and Real Property Acquisition Monitoring Plan
- Section 504 Accessibility Monitoring Plan
- Self-Monitoring Monitoring Plan
- Subrecipient Agreements Monitoring Plan

The *GENERAL INSTRUCTIONS to Monitoring Plans* provides an overview of the monitoring plans and monitoring instructions, including sampling techniques. The reviewer should consult the General Instructions prior to using the monitoring plans.

When reviewing the ICDBG, RHED/RIF, or ROSS programs, the reviewer should use the *Other Programs Monitoring Plan,* which is specific to those programs' requirements, and identifies the other monitoring plans necessary to conduct a complete review; i.e., Procurement and Contract Administration Monitoring Plan, Environmental Monitoring Plan, etc.

The General Instructions and monitoring plans listed below are available at HUD's Code Talk website:
http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/ih/grants/oversight

For further information, contact your Area ONAP Grants Evaluation Specialist.