

SELF MONITORING & EVALUATION PROCEDURES

The Board of Commissioners of the Coeur d'Alene Tribal Housing Authority (CDTHA) recognizes the fact that as the governing body of the CDTHA, they are responsible for establishing policies that ensure sound management practices of the CDTHA. The Executive Director is responsible for establishing procedures to effect accountability and progress. Self-reflection facilitates accountability, growth and productivity, and teamwork. Below are the procedures utilized by the CDTHA staff to formally monitor and evaluate the activities of the CDTHA, ensuring compliance with applicable codes, rules, and regulations and realization of goals and objectives described in the CDTHA's Indian Housing Plan (IHP).

This document will be used semi-annually to record the results of CDTHA's self-monitoring and evaluation system. It is designed to be used by CDTHA staff as a management tool in operating the CDTHA as a property management and development business.

1. Monitoring Strategy and Plan

a. Semi-Annual evaluations

1. The CDTHA Executive Director shall complete a Monitoring Plan by September 30th and March 31st of each fiscal year encompassing the following items:
2. The CDTHA Executive Director assign staff to an area outside of that staff person's responsibility. For example, Finance will not be permitted to monitor finance's work. In some instances, the Executive Director may require an outside consultant to examine a specific area.
3. The Executive Director will record the areas to be examined and the staff assigned in a spreadsheet.
4. The Executive Director shall provide a copy of the Monitoring Plan to all staff and to the Board of Commissioners. Any amended plan will be distributed to the same individuals.

b. Spot Checks

1. Spot checks shall be conducted at the discretion of the Executive Director.
2. Areas to be spot checked will be identified by the Executive Director. Areas may include, but are not limited to the following: financial matching, inventory, procurement, maintenance inspections, etc.
3. At least two spot checks will be completed each fiscal year.

4. The Executive Director may assign staff or obtain a third party to conduct spot checks.
5. Based on the results of the spot check, the Executive Director will determine if corrective actions are necessary and take steps accordingly.

c. Resolution of Noncompliance Areas and Issues

1. Any deficiencies discovered or explanations needed shall be noted in the ***Comment*** section of the Monitoring Plan.
2. Based on the results of the Monitoring Plan, the Executive Director will establish a Performance Improvement Plan with target dates and corrective actions to prevent the recurrence of the deficiencies.
3. The Performance Improvement Plan will be submitted to the CDTHA Board of Commissioners at least 30 days of completion of the Monitoring Plan.
4. The Executive Director will provide oversight to ensure that all deficiencies are corrected and concur on the closure of each deficiency.

2. Areas to be Evaluated

- a. IHP
- b. One Year Plan
- c. Organization & Staffing
- d. Board of Commissioners
- e. Leadership
- f. Communication
- g. File Management
- h. Personnel Policies
- i. Policies General
- j. Insurance
- k. APR
- l. ER
- m. Housing Management
- n. Counseling
- o. Vacancy
- p. Collections
- q. Court Action
- r. Maintenance & Inspections
- s. Project Management
- t. Indian Preference
- u. Procurement

- v. Force Account
- w. Fiscal Management

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
IHP PREPARATION				JULES
Is a copy of the IHP provided to the Chairman and Tribal Council members?	X			It is put out for public notice via email. The Chairman signs it.
Is there evidence of community support for the IHP?	X			No alteration requests were made. Desk copy 2006 as an example of public posting.
Was the public given an opportunity to comment on the IHP before it was submitted to HUD?	X			Presented at BOC meetings and posted.
Is there evidence of the opportunity for Tribal Council involvement in the development of the IHP?	X			Tribal Council signs it. It is posted. Meetings with AD, Council Liaison, public hearings, and BOC. In reports to BOC and to Council. Council is invited to meetings.
Is the language of the CDTHA mission statement being addressed and low income families in the jurisdiction of the tribe being served?	X			Our mission is to provide safe, sanitary, and affordable housing to low and moderate income Native American families on near the Coeur d'Alene Reservation and <u>in all areas where enrolled members reside</u> and other Native American families living in Idaho or in Spokane County.
Is progress being made in addressing the goals and objectives contained in the 5 Year plan?	X			Yes. Reference IHP.
Do the 5 Year Goals and Objectives reflect comprehensive housing plans of the Coeur d'Alene Tribe?	X			Yes. Reference IHP. Our IHP is for the Coeur d'Alene Tribe. Letter from Jim Kackman for IHBG Stimulus grant reflects this.
1 YEAR PLAN				JULES
Are the Performance Objectives described in the CDTHA IHP being completed on schedule?	X			APR indicates obstacles last year but there is justification for areas where progress had not been made where anticipated.
Is the data provided current?	X			Yes. Reference Sub-Agency project.
Is the statement of needs consistent with other Tribal data?	X			Based on census and actual data and need from waiting lists.
Is there an adequate description of the housing market?	X			Same as above.

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
Is there evidence of a linkage between the budget and the objectives?	X			Matching funds of IHBG for rehab and have utilized budget for rehab work. Money for Sub-Agy IHP shows Sub-Agency as a goal. Housing services objectives and budget support costs.
Are additional programs being planned?	X			Weatherization, Rehab for Seniors, Financial Literacy, Elderly Disabled Program.
ORGANIZATION & STAFFING		LOUIE		
Is staffing adequate to support the activities described in the CDTHA IHP and other programs?	X			Staffing is per IHP. DZ & CG
Is there an organization chart depicting lines of authority?	X			See Attachment.
Have audit findings been resolved?	X			
Is the CDTHA operating under 3 or more audit findings that are over 2 years old?		X		Two Audit Findings.
Is there evidence of frequent staff turnover?		X		
Are audits being completed within the time frames set forth in OMB Circular A-133?	X			
Is the audit being completed by an auditor experienced in auditing Indian housing?	X			Also did NPTHA and Public Housing.
Has the recipient provided HUD with a copy of its latest required audit with its APR?	X			See Attachment.
Has the CDTHA provided the Coeur d'Alene Tribe with a copy of its latest audit?	X			Provided.
Are position descriptions current and accurate?	X			
Is there proper delegation of authority and responsibility?	X			Jules always on my butt.
Are staff performance appraisals up-to-date?		X		½ way.

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
Are CDTHA Board-adopted policies maintained and available to all management staff?	X			On internet.
BOARD OF COMMISSIONERS		DAWN		
Are there regular Board meetings?	X			Every month.
Is there documentation of orientation for new Board members?	X			Computer/File.
Is there on file a certificate of the oath of office for each Board member?	X			With the executive director.
Are minutes approved in a timely manner?	X			
Are minutes and resolutions properly bound and indexed?	X			M: drive "Housing Board 2009" minutes.
Does the agenda reflect that Board members focus on long-term and significant policy issues rather than short-term administrative matters?	X			BOC provided a book of policies since 9/2/06.
Has the Board waived policy in the last year?		X		
Does the Board receive meeting packets several days in advance of the scheduled Board meeting?	X			Meeting packets are inter-off iced in a timely fashion.
Do individual Board members take actions individually outside of the Board as a collective group?	X			Trainings. The executive director reports to the board and the board reports to the council.
Do Board members receive financial statements regularly?	X			In reports at every meeting.
Do Board members respect the chain of command when confronted with staff issues?	X			Board members respect the chain of command.
Is the Board kept abreast of reviews and audits performed and follow-up actions taken to correct deficiencies identified?	X			During meeting once actions are corrected and re-submitted to the board.
Does the Board engage in training that is relevant to the CDTHA and their role as a Board member?	X			Orientation, Homebuyer Education and Robert's Rule training.

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
Does the Board participate in public hearings?	X			For certain projects.
Does the Board meet regularly with the Tribal Council?	X			Attempts to quarterly but council's agenda is often filled.
LEADERSHIP				DAVE
Does the Executive Director meet regularly with the staff?	X			Retreat once a year, staff meetings and one on one meetings
Does the Executive Director attend public hearings?	X			
Is the CDTHA on good terms with the HUD Regional Office?	X			Calls on regular basis/ Reference to Bill with HUD
Does the Executive Director maintain communications with the HUD region?	X			E-mail/ Phone Calls
Does the Executive Director attend Board of Commissioners (BOC) meetings and assists the BOC with policy analysis and development issues?	X			
Does the Executive Director maintain effective cooperation with other Tribal agencies?	X			Sometimes there are political issues.
Does the Executive Director directly supervise all CDTHA department managers and delegates supervision of other CDTHA staff?	X			
Has the Executive Director initiated any new programs or modified programs in response to NAHASDA?	X			Down Payment Assistance/ Group Work Camps/ ROSS Grant/ IDA/ WX
Has the Executive Director networked with other relevant organizations?	X			HBE-Task Force/ Disability Action Center/ BPA/ Tribal Departments/ NAIHC/ HUD/ Oweesta/ Neighborworks
COMMUNICATION				DEBZ
Are methods being used to communicate with tribal members and the general public?	X			
Are reports made to the Tribal Council in accordance with the ordinance creating the CDTHA?	X			
Are additional reports made to the Tribal Council	X			

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
beyond the requirements of the ordinance requirements?				
Are meetings held with community members?	X			
Are public notices disseminated throughout the communities?	X			
Is there a regular publication of CDTHA issues produced for the community?	X			Housing Newsletter
Does the CDTHA sponsor community activities?	X			Maintains a booth at all tribal events.
FILES MANAGEMENT		DEBBIE CHAPMAN		
Is a uniform filing system for each program area maintained by the CDTHA staff?	X			File Stack Order
Are IHBG files set up in folders subdivided as follows: 1. Grant Award/ER/Resolutions 2. Correspondence 3. Project Activity/Monitoring 4. Goals & Objectives 5. Reports 6. APR	X X X X X X			3. Budget (Original) YTD Expenditure Reports 4. Matching Funds 5. LOCC's info
Are ICDBG files set up in folders subdivided as follows: 1. Grant Award/ER/Resolutions 2. Correspondence 3. Budgets 4. Project Activity/Monitoring 5. Reports 6. ASER Reports	X X X X X X			3. Budget (original) YTD Expenditure Reports 4. Matching Funds 5. LOCC's info
Are ROSS HSS files set up in folders subdivided as	X			3. Budget (original) YTD Expenditure Reports

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
follows: 1. Grant Award/ER/Resolutions 2. Correspondence 3. Application Budget 4. Budget Monitoring 5. Project Activity/Monitoring 6. Reports 7. ELogic	X X X X X X X			4. Matching Funds 5. LOCC's info
Are ROSS ELDERLY/DISABLED files set up in folders subdivided as follows: 1. Grant Award/ER/Resolutions 2. Correspondence 3. Application Budget 4. Budget Monitoring 5. Project Activity/Monitoring 6. Reports 7. ELogic	X X X X X X X			5. Agenda Notices for Meetings, Activities, Contracts
Are OCCUPANCY files set up in folders subdivided as follows: Inside front cover: Left side: <ul style="list-style-type: none"> • Application, latest application on top • Preselection Notice (move-in & deposit requirements sheet) <ul style="list-style-type: none"> Results of Drug Testing Receipt of Security Deposit Receipt of key issuance • Certificate of Completion of Orientation/Housing Counseling Class • Tenant Itemized Worksheet <ul style="list-style-type: none"> All initial verifications (enrollment number) Copy of Payroll deduction form with date 	X X X X X X X		X	Homebuyer Education

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
Right side: <ul style="list-style-type: none"> Counseling Sessions Summary 			X	
Are vacated files maintained in a systematic manner?	X			
Are conveyed files maintained in a systematic manner?	X			
Are files stored so that they are not readily accessible to the public?	X			
Is proper disposition made of old records in accordance with established policies and procedures?	X			
Is there electronic back up of files?				Docuware not yet implemented
PERSONNEL POLICIES				DAVE
Is documentation on salary comparability being maintained?	X			PAF
Are personal leave practices in accordance with the CDTHA Board adopted Personnel Policy?	X			Leave Slips
Identify any onsite training conducted for the staff in the last 12 months.	X			Safety Meetings on Fridays Admin support days
Are travel reimbursements made in accordance with	X			Travel Vouchers

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
CDTHA Board adopted policies?				
How many of the staff attended training in the last 12 months?	17			WX/ HUD Training/ Manage Inventories
Do the CDTHA Personnel Policies contain procedures for addressing complaints and formal grievances?	X			Personnel Policies Section, Page # 31
POLICIES – GENERAL		TREVA		
Is the CDTHA in compliance with certifications described and included in the IHP?	X			Receiving grant money (ICDBG, IHBG, Ross, ect.) reflects compliance with necessary certs.
Does the CDTHA have all the necessary policies needed to operate a full scale housing management and development operation consistent with its mission?	X			Currently have policies including but not limited to Admissions & Occupancy, Maintenance, Grievance, Personnel, and Collections. Policies made public via internet.
Are travel reimbursements made in accordance with CDTHA Board adopted policies?	X			Travel authorization form must be approved by ED 2 weeks prior to travel. Reimbursements not being filed within 5 days of return of travel.
Is there a method to track complaints and formal grievances to ensure timely follow-up and response?	X			Complaints= received, entered in HDS, follow up by staff via letter. Grievances= filed, reviewed by ED, resolved, if not, BOC review, hearing (Debbie P.)
Do the CDTHA grievance procedures provide for a hearing before an impartial party?	X			"Hearing Panel" is an option (BOC)
Are there policies and procedures for non-NAHASDA programs? List the programs in comments.	X			Ross, Weatherization. Ross is governed by our policy and Weatherization has its own big binder in the Ross office.
INSURANCE		NICOLE		
Is an insurance register maintained listing all required insurance and termination dates?	X			M:/Drive Question ask Torr for more details
Note in comments how many insurance claims were there this year? Are there files established for each claim?	X			Louis has a folder of claims clearly labeled – 6 claims total: (5) – house : (1) - vehicle
Are the following types of insurance in place?				
• Property Insurance	X			

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
<ul style="list-style-type: none"> • Replacement (fire, wind, etc.) • Flood insurance • Liability and collision on vehicles • Board of Commissioners liability • Workman's Comp • Larceny, theft, burglary • Fidelity • Builder's risk 	X X X X X X X	X		
Is there an RFP prepared for insurance services?				
ANNUAL PERFORMANCE REPORT				DEB Z
Did the CDTHA submit Annual Performance Reports to HUD for all open Indian Housing Block Grant within 60 days after the end of the plan year?		X		They were submitted late, but a plan is in place for ontime submission this FY.
If the APRs weren't submitted within 60 days after the end of the CDTHA plan year, was an extension requested and granted by HUD?	X			
Was a separate APR Part submitted for each open IHP?	X			
ENVIRONMENTAL REVIEW				DEB Z
Have the environmental effects of each CDTHA 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?		X		Partially. The categorically excluded projects paperwork needs final cleanup.
Has a separate Environmental Review Record (ERR) been completed for each project?	X			
Was the applicable HUD recommended format used for the ERR?	X			
Was there a finding of No Significant Impact	X			

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
(FONSI)?				
Copy of published Notice of FONSI or a Combined Notice?	X			
Copy of published Notice of Intent or Request Release of Funds (NOI/RROF) or a Combined Notice of FONSI and NOI/RROF?	X			
Form HUD 7015.15, Request for Release of Funds and Certifications?	X			
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?	X			
With the exception of exempt activities, no IHBG funds were obligated or spent prior to the receipt of the HUD 7015.16 form?	X			
With the exception of categorically excluded activities determined to be exempted 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?	X			
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?	X			
Were recognized authoritative sources used to support the conclusions reached?	X			
If mitigating measures are required, are they included in the ERR as part of the actions pertaining to the environmental review?			X	
HOUSING MANAGEMENT		JULES		

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
Is there an Admissions & Occupancy Policy?	X			
Are conditions for eligibility defined by policy?	X			
Are conditions for ineligibility defined by policy?	X			
Are selections made in accordance with established policies?	X			
Is the waiting list adequately maintained according to policy?	X			
Are incomes verified to be within the established income limits prior to execution of a Dwelling Lease or Homebuyer Agreement?	X			Occupancy verifies during pre-selection.
Are selected participants informed of their responsibilities prior to moving in?	X			Orientation class, outline handout with deposits, one-on-one counseling.
Are the most current HUD-determined income limits being utilized?	X			Confirmed with local ONAP office if questions with data sources.
Are third party verifications of income properly documented?	X			Occupancy has frustrations with third party entities returning forms.
Are all contracts for housing assistance between the CDTHA and the participant signed and dated and in their file?	X			
Does the policy clearly identify how payments are calculated?	X			HDS is used to clarify and printout is provided to tenants.
Does it adequately delineate tenant responsibilities and CDTHA responsibilities?	X			
Are all participants in NAHASDA units paying less than 30% of their adjusted income for their housing assistance?	X			At the present time everyone's rent payments are up to 30% except non-NAHASDA units.
Are only low-income Native American families determined eligible?	X			
Are moderate-income families assisted in accordance with the HUD guidelines for assisting moderate-income families?	X			

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
Is the moderate-income family checklist documented in the family file?		X		Not consistently.
Are recertifications conducted at least annually?	X			Previous years there were delays due to staff turnover and political upheaval.
COUNSELING		NICOLE		
Is there a Board adopted policy mandating homebuyer education and housing counseling?	X			
Does housing counseling include maintenance counseling and budget counseling?	X			R & R/ Homebuyer Education Class & Smart Board
Are the facilities adequate to provide comprehensive homebuyer education and one-on-one counseling?	X			R & R/ Homebuyer Education Class & Smart Board
Are client action plans prepared for each homebuyer applicant/resident?		X		Only at time of appointment
Is there documentation that client action plans are tracked?	X			Counselor Activity Report
Is there trained staff available to conduct classes and one-on-one counseling?	X			
How many of the staff are certified to teach Homebuyer Education?	X			5
How many of the staff has over 3 years working with mortgage financing?	X			2
Is the staff knowledgeable about other public financing programs?	X			2 in Training
Does the staff regularly conduct homebuyer education classes?	X			Combined with HBE Class
Does the staff regularly conduct personal budgeting classes?	X			4 – 6 weeks
Does the counseling program network with other agencies?	X			Banks, RE, Rural Development

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
VACANCY				NICOLE
Is the annual average number of vacancy days per turnaround not more than 30 calendar days?		X		Depends on damage to unit
State average annual number of vacancy days per turnaround.				20 days to 2 months depending on the amount of damage to unit such as neglect/abuse/fire damage
Does the staff know the approximate vacancy rate?	X			
Does the CDTHA have a process for vacant unit turnaround? Describe.	X			Move Out Inspection/Checklist * See attached
COLLECTIONS				TREVA
Are provisions of the CDTHA Collection and Eviction Policy being enforced?	X			
Are delinquent notices sent out consistently each month?	X			
Does the staff know the delinquency rate?	X			
Does the CDTHA utilize an attorney to ensure lease compliance?	X			
Does the appropriate staff know the status of court filings?	X			
Does the Tribal Court handle CDTHA issues in accordance with the Tribal Code?	X			
Has the current balance for delinquencies decreased within the last six months?	X			
Are there administrative remedies available to residents prior to legal action?	X			
Are payment agreements with CDTHA tenants and homebuyers being monitored for compliance?	X			
Are delinquent tenants and homebuyers being referred to financial counseling?	X			
Do tenants accounts receivable (TARs) for tenants in possession, excluding amounts covered by a formal up-to-date repayment agreement, exceed 10% of	X			

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
monthly charges to tenants?				
COURT ACTION DOCUMENTATION				TORR
Is there EVIDENCE OF any of the following: <ul style="list-style-type: none"> • NOT • Notice To Vacate • Note From Occupancy Of Delinquency 	X X X			
Is there clear information regarding the reason for pursuing legal action?	X			
Is there a letter to parties warning of initiation of court process?	X			
Is there a work order reconciliation/account audit in the file for delinquent court actions?	X			Good compliance since 2007
Is there a Demand Letter for delinquent amounts?	X			May have been verbal but contact notes were maintained to substantiate actions taken.
Is there a notification to attorney to file in court?	X			
Is there back-up documentation in the file, such as? <ul style="list-style-type: none"> • Low-Rent Lease Agreements or Mutual Help & Occupancy Agreements • Affidavits of Service for NOTs • Work Orders / Cost of Repair Estimates • Pictures • Tenant Ledger History Reports • Move In Inspections • Move Out Inspections 	X			Move-out inspections and Move-in inspections were not done consistently prior to 2008. A revised move-out checklist insures compliance.

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
<ul style="list-style-type: none"> • Receipts from Attorney • Billing Statements from Attorney 				
<p>Are there any court docs in the file, such as?</p> <ul style="list-style-type: none"> • Summons and Complaints • Orders of Default • Memorandums of Costs • Affidavits of Attorney Fees • Affidavits of Amount Due 	X			
Is there a notice of hearing in the file?	X			
<p>Is there a form of judgment from the court, such as:</p> <ul style="list-style-type: none"> • Judgment • Stipulation for Entry of Judgment • Affidavit in Support of Writ of Restitution 	X			
MAINTENANCE AND INSPECTIONS		DEBBIE PIERCE		
Are inspections being conducted by qualified personnel who are able to explain maintenance responsibilities to program participants?	X			The inspections are being done by Wyatt and he does the explaining to tenants.
Are all units inspected at least annually?	X			A system is being implemented in HDS to show more accuracy towards the annual inspection.
Is there a list of homes that are scheduled for inspections by month, quarterly, etc?		X		Wyatt goes by the list from HDS

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
Is proper notification of scheduled inspections provided to residents?	X			There have been a few instances where the tenant wasn't notified
Are follow-up letters after inspection sent to participants?	X			Wyatt handles the letters and he does send the follow-up letters.
Is there a work order system?	X			This is implemented by HDS software
Are costs tracked by unit?	X			Dave said that this is in place in HDS
Is there a summary of all work orders performed by project, unit?	X			There is and it's in HDS, you can look by unit or project number for work orders.
Is there proper notification of charges for tenant damage?	X			Whoever does billing (occupancy) make sure that there is proper notification
Do homebuyer files contain documentation of notification of charges for tenant damage?	X			If the homebuyer calls in a complaint then it's documented and input into HDS
Do homebuyer files contain documentation of performed maintenance?	X			It's put in HDS and then placed in tenant file with WO and letter to the tenant
Are there procedures for follow-up on maintenance work completed to ensure quality workmanship?	X			Dave does the follow-up to insure there is quality workmanship done for his crew. Dave does the follow-up to insure there is quality workmanship done for his crew.
PROJECT MANAGEMENT		TORR		
Are project files maintained for each project?	X			Unclear on specific definition of a "project". Of the activities that are reasonably considered projects corresponding project files were maintained but were not kept all in one place.
Is there an estimated budget for each project?	X			
Is there a sources and uses of funds depicting hard and soft costs for each project?	X			For major projects only.
Is there an Implementation Schedule (timeline) for each project?	X			For major projects only.
Does the Implementation Schedule reflect the current status of project activities?	X			
If the project is behind schedule, were delays beyond	X			2007, 2008 ICDBG

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
the control of the CDTHA?				
Has the CDTHA responded properly to removing the obstacles to project progress?	X			
Are all the funding resources for project implementation committed?	X			
Do qualified individuals inspect the project before approval of progress payments to determine if the request is supported by acceptable work?	X			
Are inspection reports included in the files? (Tim)		X		Punch List completed by Maintenance Superintendent on all small projects but not filed. Formal inspections will be completed and filed on Gathering Place Project.
Have contract change orders been approved and do they appear reasonable?			X	CDTHA has acted as prime contractor and change orders have not been necessary.
Are minutes of project meetings available?	X			
Was the appropriate procurement method for A/E services utilized?	X			
Was the appropriate procurement method for construction services utilized?	X			
Are certified payroll records and interviews on file?			X	
Are completed subcontractor activity reports available?			X	
Does the grantee have a written code of conduct governing employees, officers, or agents engaged in the award and administration of contracts supported by grant funds?	X			
INDIAN PREFERENCE		TONI		
In the administration of its program, has the grantee provided, to the maximum extent feasible, hiring preference and training opportunities to Indians and Alaskan Natives?	X			To greatest extent feasible

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
Has the grantee imposed requirements on contractors and subcontractors to comply with Section 7(b) of P. L. 93-638?	X			Indian preference was not strictly adhered to until an Audit of our procurement contracting process identified this weakness (Audit July 0 Sept 09) Just recently have TERO compliance, it is strictly adhered to in both small and large purchase contracts - Torr
Has the grantee imposed requirements on contractors and subcontractors to comply			X	
PROCUREMENT				BARBARA
Is there clear authority and delegation of responsibilities along with a written code of standards of conduct in place?	X			
Does the policy require procurement planning? (85.36(b)(4))	X			
Does the policy contain any constraints to full and open competition? (85.36(c))	X			INDIAN PREFERENCE
Does the policy require documentation of actions taken? 85.3 (b)(9))			X	TITLE 24 PART 85.3 is not clear on this question.
Is the small purchase threshold set at \$25,000, or a lower threshold?		X		Small Purchase threshold is \$100,000
Is there a high number of contract awards to the same or affiliated contractors?		X		
Is there frequent usage of sole source or emergency purchase contracts?	X			Largely due to the remote location of CDTHA.
IF THERE WERE INSTANCES THIS YEAR REQUIRING RFPS, PLEASE LIST THE SERVICES REQUESTED IN THE COMMENT/EXPLANATION SECTION AND ANSWER THE FOLLOWING QUESTIONS.	X			-Architectural Services (Gathering Place) -Engineering Services (Gathering Place) -Cultural/Environmental Survey (Gathering Place)
Was a scope of work prepared?	X			
Was there any advertisement?	X			
Was there specific selection criteria with points assigned?	X			

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
Was there notification of the results to all the respondents?	X			
IF THERE WERE INSTANCES THIS YEAR REQUIRING SEALED BIDS, PLEASE LIST THE PROJECTS IN THE COMMENT SECTION AND ANSWER THE FOLLOWING QUESTIONS.			X	
Did the bidding documents clearly describe the item(s)/work to be done so as to promote competition?			X	
Were bids publicly opened as stated in the Invitation for bids?			X	
Were firm fixed-price contracts awarded to the lowest responsive and responsible bidder?			X	
Was the noncompetitive proposal method used only when the awards of the contracts were infeasible under other methods and under the conditions specified in 85.36(d)(4)?			X	
FORCE ACCOUNT	DEB Z			
Is there an available labor force to support year round construction work?		X		Not at this time.
Is there year round work to provide full-time employment for a force account crew?		X		Not at this time.
Does the CDTHA have qualified staff and procedures to procure materials and manage material distribution and storage?	X			
Does the CDTHA have facilities to store and manage the storage and distribution of project materials?	X			
Does the CDTHA have the financial capacity to process and track the anticipated payroll and material expenditures?	X			
Does the CDTHA have an experienced construction superintendent to supervise the construction crews?	X			

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
Does the CDTHA have experienced personnel who can manage the project including budgets, schedules, sequencing, contract management, material management, quality control, and problem resolution?	X			
Are there clear plans and specifications that are reasonable in scope for development or rehabilitation by force account?			X	No force account in place.
Is there an adequate budget for contingencies to address unforeseen delays, the cost of changes, and budget over-runs?	X			
Are political factors considered in the management of a force account crew?			X	No force account in place.
Is there a force account management system to ensure compliance with labor requirements including the maintenance of records?			X	No force account in place.
FISCAL MANAGEMENT		CIELO & TREVA		
Are required <u>Federal Cash Transaction Reports</u> (SF272) being submitted in a timely and accurate manner?	X			Spoke with Debi Z.
Has the CDTHA maintained access to LOCCS and <u>never</u> been denied access because of late reporting during the current IHP year?		X		Been denied access due to hold up with Chief's signature per Debbie P. This has happened several times.
Does the Finance Manager know the amount of reserves available excluding receivables?	X			Bank balances are done every month so she knows what is available throughout the month.
Does the Finance Manager track reimbursements to NAHASDA from other programs?	X			Done according to matching schedules and a consolidated budget for guidance.
Does the Finance Director track matching funds? How does the system work?	X			Currently spreadsheets are used to track matching funds. Implementing new system in October.
Are tenant accounts receivables reconciled on a monthly basis?	X			Recons done monthly by Torr.
Does the CDTHA deliver or send checks for payment of IHBG program costs within 3 days of the deposit of such funds?	X			We spend the money first then request funds to avoid using the 3 day deposit.

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
Do the CDTHA accounting records adequately identify the source and application of funds provided in the following areas?	X			Each program / grant funding has an identifying number that allows recon of all incoming funds and payments.
Obligations				
Assets				
Liabilities				
Unobligated balances				
Expenditures				
Income				
Are CDTHA cash receipts and cash disbursement journals current and accurate?	X			Monthly binders compiled daily by front desk staff .
Are bank statements reconciled monthly?	X			Bank recs done monthly by Torr and Debi Z.
Has the recipient been required to remit funds to HUD because of excessive drawdowns?		X		Never have.
Does the CDTHA use and issue pre-numbered cash receipts in numerical order?	X			Numerical receipts generated by HDS.
Is there adequate separation of responsibility in the receipt recording and deposit of cash receipts?	X			Front desk receives money, receipts / cash verified by Debi Z or Torr, taken to bank by Debbie P.
Are all checks received immediately stamped "For deposit only?"	X			Stamped at time it's submitted for payment or stamped when opened if rec. by mail.
Are all checks, money orders and cash received immediately placed in a secure fireproof file or cash drawer upon receipt?	X			All cash, checks, and money orders are placed in cash box immediately.
Are receipts completed and recorded immediately upon receipt of cash, checks, or money orders?	X			Receipt generated at time of payment.
Are all funds deposited in accordance with the CDTHA financial management policies and procedures?	X			Daily deposit(s).
Are cash receipts reconciled daily with the deposit slips in accordance with the CDTHA's financial	X			Daily closeout verification.

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
management policy?				
Does someone other than the CDTHA employee recording cash receipts and making deposits reconcile cash receipts with the deposit slips?	X			Front desk staff records receipts and deposits, Accounting department reconciles.
Are there employee IOU notes or personal checks for cash exclusive of cash receipts for legitimate housing payments?		X		We don't accept IOU's or Post dated checks for payments.
Are all expenditures, other than payroll, supported by invoices, contracts, check requests, or purchase orders?	X			Talked to Debbie P.
Do checks require two signatures?	X			Talked to Debi Z.
Are checks for payment made by pre-numbered checks?	X			Checks are pre-numbered and issued in numerical order.
Are all direct salaries and wages paid to CDTHA employees supported by time cards or sign-in sheets?		X		All employees submit time sheets, but salaried employees do not use time cards or sign in sheets.
Are missing, voided or altered checks recorded and processed in accordance with the CDTHA financial management policy?	X			Talked to Debi Z.
Are CDTHA unused checks kept in a safe and secure location?	X			Live checks are kept in locked drawer in acct. department, non live are in secured front supply room.
Is the CDTHA petty cash and change fund maintained in accordance with the CDTHA financial management policy?	X			In system as Cash Drawer (\$100) and Petty Cash (\$100)
Do CDTHA policies prohibit signing blank checks?	X			Debi z.
Do all expenditures require approval by authorized persons?	X			Employees must submit a PO prior to spending any money.
Are unpaid invoices maintained in an unpaid invoice file?	X			Had lengthy convo with Debi Z.
Is there an adequate system for monitoring implementation of activities, including budget controls	X			Had lengthy convo with Debi Z.

EVALUATION QUESTIONS	YES	NO	NA	COMMENT/EXPLANATION
and timely completion of each activity?				
Are internal operating budgets available that support goals and objectives?	X			Had lengthy convo with Debi Z.
Is there a consolidated sources and uses budget?	X			Had lengthy convo with Debi Z.
Are travel and training costs appropriately tracked and summarized?	X			Had lengthy convo with Debi Z.

SPOT AUDITS CONDUCTED	COMPLETED			ASSIGNED TO:	
	YES	NO	NA		
-Cash Receipts	X			Torrence Bonney, Finance	
-Unit Status (Mutual Help, Rental, Conveyed)	X				
-Mutual Help Principal Reduction Program	X				
-Court Garnishments	X				
-Interest Assessments on Court Garnishments	X				
-Per Capita Assignments	X				
-55EDF Program	X				
-Tenant Accounts in Court Status (work order charges for tenant abuse/neglect)	X				
-Property Insurance for each unit in inventory	X				
-TERO Compliance	X				
-Small Purchase Contract Doc Procedures	X				
-Large Purchase Contract Doc Procedures	X				
-Court & Attorney Fees Assesments	X				Jules Summers
-Voluntary Assignments of Per capita	X				
-Audit of Court Garnishments	X				
-Court Files	X				
-IHBG, ICDBG, ROSS Files	X				
Survey of performance	X			Home Fair staff	