

**APR Development Process and IHP Monitoring Self-Monitoring Checklist for Program Year \_\_\_\_\_**

<b>APR Development Process and IHP Monitoring</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
1. Are activities consistent with the approved IHP?				
2. Is progress consistent with the one-year goals and objectives in the IHP?				
3. Is program progress consistent with progress reported in the APR?				
4. Is the number of low-income families being assisted consistent with the IHP?				
5. Is there evidence that the number of families in the jurisdiction or the number of low-income families in the jurisdiction is consistent with the IHP or formula allocation?				
6. Is available data consistent with the recipient's description of the housing market?				
7. Is there evidence that the recipient has coordinated NAHASDA activities with other governmental agencies?				
8. Is there evidence that the recipient has coordinated with welfare agencies?				
9. For 1937 Act units that have been demolished or disposed of, has one of the following conditions been met?				
a) <i>A financial analysis was done and demonstrates cost-effectiveness;</i>				
b) <i>The unit was condemned by the government with authority over the unit;</i>				
c) <i>The unit was an imminent threat to the health and safety of residents; or</i>				
d) <i>Continued habitation of the unit was inadvisable due to cultural or historic considerations.</i>				
10. Was HUD notified of any planned demolition or disposition prior to any action being taken?				
11. For disposition of 1937 Act units, were sale proceeds maximized or, alternatively, was the unit sold to a low-income Indian family?				
12. If 1937 Act units have been disposed of or conveyed, have they been reported as such for Formula Current Assisted Stock (FCAS) purposes?				
13. Are financial resources other than HUD-funded grants available as stated in the IHP?				
14. Has the recipient executed a local cooperation agreement with all appropriate local governments?				

Reviewer \_\_\_\_\_ Date of Review \_\_\_\_\_

**Organizational Control Environment Self-Monitoring Checklist for Program Year \_\_\_\_\_**

<b>Organizational Control Environment</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
<b>Integrity and Ethical Values</b>				
1. Does the organization maintain a written code of conduct or ethics?				
2. Do all staff make annual confirmations that they understand and comply with the code of conduct?				
<b>Organization Structure and Reporting Relationships</b>				
3. Does a published organization chart exist in the TDHE or tribal housing department?				
4. Are reporting lines clear to avoid duplicate responsibilities?				
5. Is there the proper delegation of authority and responsibilities?				
6. Does the organizational structure support internal controls?				
7. Is the recipient's staffing adequate?				
8. Is there evidence of frequent staff turnover?				
9. Are staff receiving adequate training?				
<b>Organizational Bylaws</b>				
10. Does the TDHE operate with Bylaws adopted by a Board?				
11. Are the Bylaws consistent with tribal ordinances and practices?				
<b>Governing Board</b>				
12. Are Board meetings held in accordance with the Bylaws?				
13. Are Board resolutions and minutes maintained and available for public access?				
14. Are Board members provided quarterly financial statements and progress reports?				
15. Does the Board maintain established criteria to evaluate the performance of the Director?				
16. Does the Board conduct a performance evaluation of the Director on an annual basis?				

<b>Organizational Control Environment</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
<b>Policies and Procedures</b>				
17. Do written policies and procedures exist that encompass personnel, financial management, procurement, and housing assistance program areas?				
18. Is there an established process for documenting compensation comparability of staff positions?				
19. Are reimbursements for staff travel explicitly defined?				
20. Are personnel position descriptions accurate and current?				
<b>Records Management</b>				
21. Are records maintained for a period of 3 years from the last APR submission?				
<b>Self-Monitoring Policy</b>				
22. Has a written self-monitoring policy been adopted by the organization?				
23. Do tribal officials monitor HUD grants without undue interference?				
24. Does the organization conduct self-monitoring on a regular basis?				
<b>Monitoring of Sub-recipients</b>				
25. Was there a budget established for the project?				
26. Does a written agreement exist with each sub-recipient?				
27. Does the contract or agreement clearly address or establish:				
a) <i>a statement of work?</i>				
b) <i>an operating budget?</i>				
c) <i>reporting requirements for self-monitoring?</i>				
28. Does the recipient monitor sub-recipients on site at least annually or more often if the contract requires it?				
29. Does the recipient follow up on any findings to assure that corrective measures or actions were taken?				

<b>Organizational Control Environment</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
<b>Complaint and Grievance Resolution</b>				
30. Does the organization have written policies and procedures for addressing complaints and formal grievances?				
31. Is there a method to track complaints and formal grievances to ensure timely follow up and response?				
32. Do formal grievance procedures provide for a hearing before an impartial hearing official or panel?				
33. Is there a method to ensure that the cause of validated complaints and grievances are addressed to prevent reoccurrence?				
<b>Open Findings</b>				
34. Are there any open findings in this area identified by either HUD and/or auditor?				
a) <i>If yes, summarize the finding(s):</i>				
b) <i>What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)?</i>				
c) <i>What is the current status of the finding(s) as of the date of this evaluation?</i>				
d) <i>What is the tribe's/TDHE's target date for responding to HUD or auditor findings?</i>				

Reviewer \_\_\_\_\_ Date of Review \_\_\_\_\_

**Resident Eligibility and Service Standards Checklist for Program Year \_\_\_\_\_**

Resident Eligibility and Service Standards	Yes	No	N/A	Recommendations/ Notes
<b>Statutory/Regulatory Requirements</b>				
1. Is adequate insurance coverage maintained on all units owned, operated, or assisted with IHBG funds?				
2. Has the useful life been defined for all applicable units?				
3. Are units receiving NAHASDA assistance maintained as affordable during their useful life?				
<b>Eligibility</b>				
4. Is there a written policy on family income eligibility readily available to staff and posted for public access?				
5. Are the most current HUD-determined income limits being used for eligibility criteria?				
6. If no, have no more than 10% of IHBG funds been used to assist families whose incomes fall within 80% to 100% of the median income?				
7. Are only low-income Native American families determined eligible?				
8. Are you in compliance with the requirements, with no exceptions?				
9. If there are exceptions, why? (e.g., non-low-income families require HUD approval)				
10. If assistance was provided to a non-Indian family, is there documentation that the presence of the family is essential to the well-being of Indian families and the need for housing for this family cannot otherwise be met?				
11. Does the family income eligibility review include rent-paying habits and/or credit checks?				
12. Are applicants adequately counseled on IHBG program requirements?				
13. Is the waiting list adequately maintained and documented and dated with offers?				
14. Are applicants determined to be "ineligible" notified of reasons and options available to them?				

<b>Resident Eligibility and Service Standards</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
<b>Selection</b>				
15. Is there a written policy on eligibility readily available to staff and posted for public access?				
16. Are the admissions of selected participants documented adequately to reflect compliance with Board policies? For example, signed and dated rating forms for each selection?				
17. Are incomes verified to be within the income limits prior to execution of a housing assistance contract or agreement?				
18. Are all "contracts for housing assistance" between the recipient and the participant signed and dated and maintained in a unique confidential household file?				
19. Are selected participants counseled on their housing assistance responsibilities?				
<b>Rent and Payment Determination Checklist</b>				
20. Is there a written policy on rent and payment determination readily available to staff and posted for public access?				
21. Are payments calculated according to policy requirements?				
22. Are all IHBG-assisted families paying 30% or less of their annual income for housing assistance?				
23. Are verifications of income properly documented in unique household files?				

Resident Eligibility and Service Standards	Yes	No	N/A	Recommendations/ Notes
<b>Occupancy</b>				
Do you have a written occupancy policy that:				
24. Does not contain unreasonable terms or conditions?				
25. Requires the owner or manager to maintain the housing in compliance with applicable housing codes and quality standards?				
26. Requires 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?				
27. Specifies 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 examine any relevant documents, records, or regulations directly related to the eviction or termination?				
28. Requires that the owner or manager may not terminate the tenancy, during the term of the lease, except for serious or repeated violation of the terms or conditions of the lease, violation of applicable federal, state, tribal, or local law, or for other good cause?				
29. Provides that the owner or manager may terminate the tenancy of a resident for any activity, engaged in by the resident, any member of the household of the resident, or any guest or other person under the control of the resident, that:				
a) <i>Threatens the health or safety of, or right to peaceful enjoyment of the premises by, other residents or employees of the owner or manager of the housing?</i>				
b) <i>Threatens the health or safety of, or right to peaceful enjoyment of the premises by, persons residing in the immediate vicinity of the premises?</i>				
c) <i>Is criminal activity (including drug-related criminal activity) on or off the premises?</i>				

Resident Eligibility and Service Standards	Yes	No	N/A	Recommendations/ Notes
<b>Maintenance and Inspections/Management</b>				
30. Are all participant files properly documented per required Policy actions?				
31. Are inspections of applicant units fully completed and documented in files?				
32. For rehabilitation programs:				
a) <i>Have policy standards for the type, cost-effectiveness and cost of rehabilitation of a home been followed?</i>				
b) <i>Was the Scope of Work (work order) for rehabilitation completed within budget and timeframes for each unit?</i>				
c) <i>Is there follow-up on rehabilitation work completed to ensure quality workmanship?</i>				
33. For homeownership programs:				
a) <i>Have policy standards for the type, cost-effectiveness and cost of new homes been followed?</i>				
b) <i>Was the Scope of Work (work order) for new construction completed within budget and timeframes for each unit?</i>				
c) <i>Is there follow up on construction work completed to ensure quality workmanship?</i>				
d) <i>Are post-occupancy inspections conducted?</i>				
<b>Public Dissemination</b>				
34. Do you have a written eligibility policy that is publicly available?				
35. Do you have a written selection policy that is publicly available?				
36. Do you have a written rent or payment determination policy that is publicly available?				
37. Do you have a written occupancy policy that is publicly available?				
38. Do you have a written maintenance policy that is publicly available?				
39. Do you have a written grievance policy that is publicly available?				
40. Do you have a written collections policy that is publicly available?				

Resident Eligibility and Service Standards	Yes	No	N/A	Recommendations/ Notes
<b>Collections</b>				
41. Are all provisions of the tribe/TDHE collections policy enforced consistently?				
42. Are delinquency notices sent out consistently at the beginning of each month?				
43. Does the Tribal Council evidence support of collection efforts for delinquent payments?				
44. What is the current balance for delinquencies from assisted households?				
45. Is this an increase within the last six months?				
<b>Lead-Based Paint</b>				
46. Are you assisting dwelling units constructed before 1978? <i>If no, please proceed to question 55</i>				
47. Have these dwelling units been visually inspected for defective paint surfaces by a qualified lead-based paint inspector?				
48. Did the inspection find any defective paint surfaces?				
49. If yes, were such surfaces treated within 30 calendar days of the visual evaluation?				
50. Do you have any dwelling units constructed before 1978 that is occupied by a family with a child under the age of six years with an identified elevated blood lead level (EBL)?				
51. If yes, has a qualified lead-based paint inspector tested chewable surfaces for lead-based paint using an X-ray fluorescence analyzer or by laboratory analysis of paint samples?				
52. If yes, have the paint surfaces been treated within 30 days of the paint testing report?				
53. Have you taken appropriate action to protect residents and their belongings from hazards associated with treatment procedures?				

Resident Eligibility and Service Standards	Yes	No	N/A	Recommendations/ Notes
<b>Temporary Relocation/Acquisition</b>				
54. If you do not have the authority to acquire the real property through condemnation, did you inform the owner of the amount you believe to be the fair market value of the property before discussing the purchase price?				
55. Did you have the property appraisal prepared by a qualified appraiser?				
56. Did you tell the owner you will be unable to acquire the property if negotiations fail to result in an amicable agreement?				
57. If the proposed acquisition payment exceeds the fair market value, did you request HUD approval of the proposed acquisition price before executing a firm commitment to purchase the property?				
58. Did you take all reasonable steps to minimize displacement of persons (households, businesses, nonprofit organizations, and farms) as a result of a project assisted by IHBG funds?				
59. Did you provide temporarily relocated residential tenants and homebuyers with reimbursement for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation, including the cost of moving to and from the temporarily occupied housing and any increase in monthly housing costs (e.g., rent/utility costs)?				
60. Did you provide temporarily relocated residential tenants and homebuyers with reasonable advance written notice of:				
a) <i>The date and approximate duration of the temporary relocation?</i>				
b) <i>The location of the suitable, decent, safe, and sanitary dwelling to be made available for the temporary period?</i>				
c) <i>The terms and conditions under which the tenant may occupy a suitable, decent, safe, and sanitary dwelling in the building/complex following completion of the repairs?</i>				
d) <i>The provisions for reimbursement?</i>				
61. If relocation was necessary, did you provide relocation assistance for displaced persons at the levels described in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR part 24?				

<b>Resident Eligibility and Service Standards</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
62. Did you certify you will comply with the URA, the regulations at 49 CFR part 24, and the requirements of 24 CFR §1000.14?				
63. Did you maintain records in sufficient detail to demonstrate compliance with these regulations?				
<b>Open Findings</b>				
64. Are there any open findings in this area identified by either HUD and/or auditor?				
a) <i>If yes, summarize the finding(s):</i>				
b) <i>What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)?</i>				
c) <i>What is the current status of the finding(s) as of the date of this evaluation?</i>				
d) <i>What is the tribe's/TDHE's target date for responding to HUD or auditor findings?</i>				

Reviewer \_\_\_\_\_ Date of Review \_\_\_\_\_

**Fiscal and Financial Management Checklist for Program Year \_\_\_\_\_**

Fiscal and Financial Management	Yes	No	N/A	Recommendations/ Notes
<b>Reporting</b>				
1. Are reports (e.g., HUD-272-I Federal Cash Transaction Report, quarterly submission) submitted in a timely manner?				
2. Are you notice-free (no notices from HUD on the accuracy of the reports submitted)?				
3. Have you always maintained access to LOCCS due to timely reporting?				
4. Do financial reports and statements present a clear picture of financial results and condition?				
5. Are data available for the preparation of reports on:				
<i>a) Current month and year-to-date activities versus budget?</i>				
<i>b) Current month versus same month prior year actuals?</i>				
<i>c) Current year-to-date versus prior year-to-date?</i>				
<i>d) Exception reporting of variances in excess of predefined percentage or dollar amount?</i>				
<b>Audits</b>				
6. Do you maintain all of the information and data needed for an annual audit?				
7. Did you submit your last annual audit in a timely manner?				
8. Are you taking steps to prepare in advance for your upcoming annual audit?				
<b>Budget</b>				
9. Have detailed budgets been estimated for each activity?				
10. Do accounting records allow and provide for the comparison of actual expenditures with budgeted amounts for each grant?				
11. Is there evidence that the grant recipient periodically (at least once a quarter) compares actual to budgeted expenditures?				
12. Do accounting records include tracking of expended/unexpended and obligated/unobligated balances?				
13. Are program budgets revised and approved, when necessary, in accordance with program requirements?				

<b>Fiscal and Financial Management</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
14. Does a regular budget control review occur, covering areas of:				
<i>a) Administrative expenses?</i>				
<i>b) Labor overtime?</i>				
<i>c) Direct and indirect labor?</i>				
15. Do managers of all the various affected functions of the organization participate in the development of budgets?				
16. Is adequate information available at the time budgets must be prepared in order to develop meaningful budgets?				
17. Are data reported against budgets accurately (if actual) or fairly (if allocated)?				
18. Does the recipient have a separate budget and separate accounts for IHBG funds?				
<b>Drawdowns</b>				
19. Does the release of the check for payment of program costs occur within 3 days of the deposit of funds?				
20. Are Request Vouchers for payment:				
<i>a) Prepared?</i>				
<i>b) Accurate?</i>				
<i>c) Documented?</i>				
21. Are the established internal controls for requesting funding followed?				
<b>Accounting Records Checklist</b>				
22. Do the accounting records adequately identify the source and application of funds provided in the following areas:				
<i>a) Obligations?</i>				
<i>b) Unobligated balances?</i>				
<i>c) Assets?</i>				
<i>d) Liabilities?</i>				
<i>e) Outlays/expenditures?</i>				
<i>f) Income?</i>				
<i>g) Sub-recipient awards or obligations?</i>				

<b>Fiscal and Financial Management</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
23. Are cash receipts/cash disbursement journals current and accurate?				
24. Are bank statements reconciled monthly and in a timely manner?				
25. Are bank reconciliations free of discrepancies?				
26. If discrepancies exist, are they investigated and resolved?				
<b>Internal Controls</b>				
27. Is there segregation of duties in terms of financial transactions?				
28. Do you have a policy on who in your organization can authorize payments?				
29. Are all disbursements accompanied by adequate documentation, in the form of receipts or an invoice?				
<b>Cash Management — Cash Receipts</b>				
30. If the cash receipts process is computerized, is system security adequate?				
31. Is there adequate separation of responsibility in the receipt, recording, and deposit of cash receipts?				
32. Are cash funds secured?				
33. Are all funds deposited at least weekly?				
34. Do you use and issue pre-numbered cash receipts in numerical order?				
35. Are all cash receipts accounted for?				
36. Are deposit slips free of erasures or alterations?				
37. 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?				
38. Are there employee IOU notes or personal checks (exclusive of cash receipts for legitimate housing payments)?				
39. Do you have a separate budget and separate accounts for IHBG funds?				
<b>Cash Disbursements</b>				
40. Are all disbursements, except those from petty cash, made by pre-numbered checks?				
41. If program income is received, is this income disbursed on affordable housing activities?				
42. Are all expenditures supported by invoices, contracts, purchase orders, etc.?				
43. Are all direct salaries and wages of employees supported by time cards?				

<b>Fiscal and Financial Management</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
44. Are direct salaries that are prorated supported by time distribution records?				
45. If the cash disbursements system is computerized, is the system security adequate?				
46. Are all of the checks in order (i.e., not missing, voided, or altered)?				
47. If authorized, do petty cash and/or change fund(s) reflect what is on the general ledger?				
48. Are cash counts done randomly, with documented regularity?				
49. Do the on-site cash counts of petty cash and/or change fund show that these are free of discrepancies?				
50. Is there a written prohibition against signing checks in advance?				
51. Are all expenditures approved in advance by authorized persons?				
52. Are unpaid invoices maintained in an unpaid invoice file?				
53. Are invoices from unfamiliar or unusual vendors reviewed and approved for payment by authorized personnel who are independent of the invoice processing function?				
54. If the organization keeps an accounts payable register, are payments promptly recorded in the register to avoid double payment?				
55. Is a cash disbursement voucher prepared for each invoice or request for reimbursement that details the date of check, check number, payee, amount of check, description of expense account (and restricted fund) to be charged, authorization signature, and accompanying receipts?				
56. Is a cash disbursement journal prepared monthly that details the date of check, check number, payee, amount of check, and columnar description of expense account (and restricted fund) to be charged?				
57. Are advance payments to vendors and/or employees recorded as receivables and controlled in a manner which assures they will be offset against invoices or expense vouchers?				
<b>Investments/Banking</b>				
58. Are IHBG funds in one or more accounts separate from other funds?				
59. Are 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?				
60. Do you have an executed General Depositary Agreement?				
61. Is cash in excess of immediate need identified and invested?				

<b>Fiscal and Financial Management</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
62. Are funds invested in instruments or obligations that meet the requirements of 24 CFR §1000.58(a), including: Obligations of the United States; obligations issued by Government-sponsored agencies; securities that are guaranteed or insured by the United States; mutual (or other) funds registered with the Securities and Exchange Commission and which invest only in obligations of the United States or securities that are guaranteed or insured by the United States; or accounts that are insured by an agency or instrumentality of the United States or fully collateralized to ensure protection of the funds, even in the event of bank failure.				
<b>Insurance</b>				
63. Have you provided adequate insurance against loss from fire, weather, and liability claims for all housing units you own or operate?				
64. Do you require contractors and subcontractors to either provide insurance covering their activities or negotiate adequate indemnification coverage to be provided in their contract with you?				
65. Do you use an Insurance Register to track all insurance activity?				
<b>Allowable Costs</b>				
66. When you do a periodic check of expenditures, do you find all expenditures were necessary and reasonable for proper and efficient administration of the program, as related to:				
<i>a) Salaries and related costs?</i>				
<i>b) Administrative service contracts (e.g., legal, account, audit, consulting)?</i>				
<i>c) Travel expenditures?</i>				
<i>d) Other administrative costs?</i>				
67. 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 :				
<i>a) Entertainment?</i>				
<i>b) Contributions and donations?</i>				
<i>c) Fines and penalties?</i>				
<i>d) General governmental expenditures including salary and expenses of staff and Commissioners?</i>				

<b>Fiscal and Financial Management</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
e) <i>Other (Please Specify)</i>				
68. Do you ensure no costs related to political activities are charged to the IHBG program?				
69. Do you subtract all applicable credits before charging costs to the IHBG program?				
70. Are all costs charged to the IHBG program allocable to the program and not included as a cost of any other federally-financed program in either the current or a prior period?				
71. Are indirect grantee costs charged to the IHBG program only with support from an indirect cost proposal/cost allocation plan?				
72. If there is staff working on non-NAHASDA program activities, is the allocation of their salaries computed appropriately?				
73. Is the percentage of IHBG funds used for administrative costs the same as the percentage stated in the IHP?				
74. Does a review of program activities establish that all IHBG funds were spent or obligated for affordable housing activities as defined in Section 202 of the Act?				
<b>Open Findings</b>				
75. Are there any open findings in this area identified by either HUD and/or auditor?				
a) <i>If yes, summarize the finding(s):</i>				
b) <i>What entity (or organizational unit) has been assigned responsibility for clearing the finding(s)?</i>				
c) <i>What is the current status of the finding(s) as of the date of this evaluation?</i>				
d) <i>What is the tribe's/TDHE's target date for responding to HUD or auditor findings?</i>				

Reviewer \_\_\_\_\_ Date of Review \_\_\_\_\_

**Procurement and Contract Administration Checklist for Program Year \_\_\_\_\_**

Procurement and Contract Administration	Yes	No	N/A	Recommendations/ Notes
<b>Procurement Planning</b>				
1. Do you engage in periodic procurement planning, including independent cost estimates?				
<b>Conflict of Interest</b>				
2. Do you have a <b>written code of standards of conduct</b> governing the performance of your employees engaged in the award and administration of contracts?				
<b>Small Purchases</b>				
3. Can staff document receipt of an adequate number of price or rate quotations from qualified sources for procurements of \$100,000 or less?				
<b>Competitive Sealed Bids (Formal Advertising)</b>				
4. Did the staff receive at least two responsive bids from responsible bidders for each procurement transaction?				
5. Did 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?				
6. Did staff advertise the Invitation For Bid (IFB) in a publication of general circulation?				
7. Were bids solicited from an adequate number of potential bidders?				
8. Did 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?				
9. Were all bids assessed against the same award evaluation criteria?				
10. Were all bids opened publicly at the time and place stated in the IFB?				
11. Was the contract awarded to the lowest responsive and responsible bidder?				
<b>Competitive Proposals</b>				
12. Was this procurement method utilized only when conditions were not appropriate for the use of competitive sealed bids?				
13. Were the proposals solicited from an adequate number of qualified sources, consistent				

<b>Procurement and Contract Administration</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
with the nature of the procurement?				
14. Did the staff publicize the RFP and honor reasonable requests by parties to compete to the maximum extent practicable?				
15. Did the RFP identify all significant evaluation factors, including price or cost where required, and their relative importance?				
16. Did staff use a method for conducting technical evaluations of the proposals received and documenting the selection of awardees?				
17. Did staff make awards to the most responsive and responsible offerors whose proposals would be most advantageous to the recipient after price and other factors were considered?				
18. If proposals involving A/E professional services were evaluated with respect to factors other than price, did staff document the basis for negotiation of fair and reasonable compensation?				
<b>Noncompetitive Proposals</b>				
19. Can the staff show that another method of procurement (small purchases, sealed bids or competitive proposals) was not feasible because: the item was only available from a single source; or, a public exigency or emergency was of such urgency to not permit use of competitive solicitation; or, after solicitation of a number of sources, competition was determined inadequate?				
20. If the answer is No, was approval given by HUD for use of this method?				
<b>Contractor Qualifications</b>				
21. Do you do business only with responsible contractors who have the ability to perform the required work, both financially and technically, and who have a satisfactory record of integrity, past performance, and compliance with applicable rules and regulations?				

Procurement and Contract Administration	Yes	No	N/A	Recommendations/ Notes
<b>General Provisions/Procedures Checklist</b> <i>To ensure you are following the general procedures for procurement, pull a sample of procurement case files (three to five, depending on your organization's procurement activity). Spot check these to answer the following questions:</i>				
22. Was there a rationale in the file for:				
a) <i>The selection of the method of procurement?</i>				
b) <i>The selection of contract type?</i>				
c) <i>The contractor selection or rejection?</i>				
d) <i>The basis for the cost or price of the contract?</i>				
23. Is contract pricing always based on a method other than the "cost-plus-a-percentage-of-cost" method?				
24. Are purchase orders and contracts signed by an authorized program official?				
25. Are items that are delivered and paid for consistent with the items contained in the corresponding purchase order and/or contract?				
26. Are vendors paid in a timely manner once requested orders have been delivered, inspected, and accepted and payment of the vendor has been approved?				
27. Is a cost or price analysis performed in connection with every procurement action, including contract modifications?				
28. Were the contract provisions listed in 24 CFR §85.36(i) appropriately included in the grant-assisted contracts?				
29. Can staff document a system of contract administration for determining the adequacy of contractors' performance?				
30. If applicable, can the staff show that the sub-recipients are required to follow applicable procurement policies and procedures in the administration of their contracts and purchase orders?				

Procurement and Contract Administration	Yes	No	N/A	Recommendations/ Notes
<b>Bonding and Insurance</b>				
31. If contracts have been awarded for construction or facility improvements under the grant program(s), did the staff:				
a) <i>Follow its own requirements relating to bid guarantees, performance bonds, and payment bonds for construction contracts or subcontracts valued at or below \$100,000?</i>				
b) <i>Meet the minimum federal requirements for bid guarantees, performance bonds and payment bonds (24 CFR §85.36(h)) or the alternatives set forth in 24 CFR §1000.26(a)(12) for construction contracts or subcontracts valued above \$100,000?</i>				
<b>Procurement Preferences</b>				
32. Have you certified to HUD that your adopted policies and procedures will provide preference in procurement activities consistent with the requirements of section 7(b) of the Indian Self-Determination and Education Assistance Act?				
33. Has the staff attempted, to the greatest extent feasible consistent with Indian Preference requirements, to award contracts for work to be performed under the programs to business concerns which provide economic opportunities to low- and very low-income persons who are residents of NAHASDA-assisted housing or who live in the metropolitan or non-metropolitan county in which the programs are undertaken?				
34. Do staff take affirmative steps to use small, minority-owned, and women-owned businesses in grant funded contracts such as:				
a) <i>Including such businesses on solicitation lists whenever they are potential sources?</i>				
b) <i>Ensuring such businesses, when identified, are solicited whenever they are potential sources?</i>				
c) <i>Dividing procurement requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by such businesses?</i>				
d) <i>Requiring prime contractors when subcontracts are let, to take affirmative steps to select small, minority-owned and women-owned businesses in grant funded contracts?</i>				

Procurement and Contract Administration	Yes	No	N/A	Recommendations/ Notes
<b>Contract Administration</b>				
35. Once the contract is awarded, do you ensure that supplies, services, or construction under contract are performed in an acceptable manner?				
36. Do you notify the contractor promptly whenever unacceptable work is done?				
37. Do you only pay for acceptable work?				
<b>Open Findings</b>				
39. Are there any open findings in this area identified by either HUD and/or auditor?				
a) <i>If yes, summarize the finding(s):</i>				
b) <i>What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)?</i>				
c) <i>What is the current status of the finding(s) as of the date of this evaluation?</i>				
d) <i>What is the tribe's/TDHE's target date for responding to HUD or auditor findings?</i>				

Reviewer \_\_\_\_\_ Date of Review \_\_\_\_\_

**Labor Standards and Contract Administration Self-Monitoring Checklist for Program Year \_\_\_\_\_**

<b>Labor Standards and Contract Administration</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
1. Are we paying Davis-Bacon wage rates when required?				
2. Are we paying HUD-determined wage rates when required?				
3. Do we pay overtime at a rate of at least time and a half on contracts greater than \$100,000 to which Davis-Bacon or HUD-determined wage rates apply?				
4. When we use volunteers on projects subject to Davis-Bacon and HUD-determined wage rates, do we obtain wage exemptions from HUD in accordance with 24 CFR Part 70?				
5. Are we in compliance with HUD Handbook 1344.1 (Federal Labor Standards Compliance in Housing and Community Development)?				
<b>Assessment of Labor Standards Administration</b>				
6. Are the following documents or information maintained:				
<i>a) Labor standards enforcement files for each construction project?</i>				
<i>b) Construction start dates?</i>				
<i>c) Contract award dates?</i>				
<i>d) Contract bid specifications with labor standards provisions?</i>				
<i>e) Pre-construction conference minutes? (optional)</i>				
<i>f) Records pertaining to violations and wage restitution? (if applicable)</i>				
<i>g) Apprentice/Trainee registration records (as needed)?</i>				
<i>h) Records of employee interviews?</i>				
<i>i) Certified payrolls maintained by project?</i>				
<i>j) Evidence of certified payroll review?</i>				
7. Are Semi-annual Labor Standards Enforcement Reports submitted to HUD Labor Relations?				

<b>Labor Standards and Contract Administration</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
<b>Labor Standards Compliance, Individual Construction Contracts</b>				
The reviewer should make a random selection of construction contracts. List the contractors and dollar amounts for these contracts.				
a) _____				
b) _____				
c) _____				
<b>Contract Components</b>				
8. Are the following elements included in each contract being reviewed?				
a) <i>Project number designation</i>				
b) <i>Name of contractor</i>				
c) <i>Description of work</i>				
d) <i>Bid opening date ( // )</i>				
e) <i>Contract award date ( // )</i>				
f) <i>Contract amount (\$ )</i>				
g) <i>Start of construction date</i>				
<b>Contract Documents</b>				
9. Are the following documents included in the contract file?				
a) <i>Proper wage decision in contract/specifications</i>				
b) <i>Labor standards provisions in the contract/specifications</i>				
c) <i>Evidence of contractor eligibility verification</i>				
d) <i>Additional classifications and wage rates processed as needed</i>				
<b>Payroll Review</b>				
a) <i>Are payrolls submitted in a timely manner?</i>				
b) <i>Are payrolls signed by employer or authorized representative?</i>				
c) <i>Are discrepancies/violations noted?</i>				
d) <i>Is there evidence of payroll review?</i>				
e) <i>Are discrepancies/violations followed through to full resolution?</i>				
<b>Employee Interviews</b>				
10. Were employee interviews conducted by the recipient?				

<b>Labor Standards and Contract Administration</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
11. Were a representative number of trades and workers covered?				
<b>Investigations and Enforcement</b>				
12. Are worker complaints handled and resolved in a timely manner, and investigations conducted where appropriate?				
13. Are escrow accounts established and funds withheld to cover labor standards violations?				
14. Are enforcement reports submitted to HUD where underpayments total \$1,000 or more?				
<b>Open Findings</b>				
15. Are there any open findings in this area identified by either HUD and/or auditor?				
a) <i>If yes, summarize the finding(s):</i>				
b) <i>What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)?</i>				
c) <i>What is the current status of the finding(s) as of the date of this evaluation?</i>				
d) <i>What is tribe's/TDHE's target date for responding to HUD or auditor findings?</i>				

Reviewer \_\_\_\_\_ Date of Review \_\_\_\_\_

**Force Account Construction Self-Monitoring Checklist for Program Year \_\_\_\_\_**

<b>Force Account Construction</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
1. Do you have an adequate system of written controls over force account activities to ensure that assets are protected, used only for authorized purposes, and in accordance with program requirements?				
2. Do you have an adequate number of qualified workers to complete the planned work?				
3. Do you have the necessary tools and equipment to complete the project on time and within budget?				
4. Do you have a system to manage and maintain equipment and tools?				
5. Do you have qualified staff and procedures to procure materials and manage material distribution and storage?				
6. Does your financial system have the capacity to process and track the anticipated payroll and material expenditures?				
7. Is the construction supervisor experienced to supervise construction crew(s)?				
8. Do you have an experienced project superintendent who can manage the project including budgets, schedules, sequencing, contract management, material management, quality control, and problem resolution?				
9. Do you have clear plans and specifications which are reasonable in scope for development by force account?				
10. Do you have arrangements for independent inspections to verify the quality of work and compliance with the plans and specifications?				
11. Do you have arrangements for independent monitoring of progress and costs to ensure the force account construction is on track?				
12. Do you have an adequate budget for contingencies to address unforeseen delays, the cost of changes, and budget overruns?				
13. Do you have a management system to ensure compliance with labor requirements including the maintenance of records?				

<b>Force Account Construction</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
14. Do you have a budget and plan to resolve development deficiencies including warranty problems?				
15. Do you have adequate insurance to protect you from loss and liability including workmen's compensation, property damage, builder's risk, and vehicular liability?				

Reviewer \_\_\_\_\_

Date of Review \_\_\_\_\_

**Tribes Assuming Environmental Review Checklist for Program Year \_\_\_\_\_**

<b>Tribes Assuming Environmental Review Responsibilities</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
1. Is there a separate Environmental Review Record (ERR) for each project?				
2. Was the current HUD-recommended (or an equivalent) format used for the ERR?				
3. Does each ERR contain the following:				
a) <i>Project description and the activities that you have determined to be part of the project, including, when applicable, geographic boundaries and all related HUD or non-HUD funded activities proposed?</i>				
b) <i>Evaluation of the effects of the project or the activities on the human environment?</i>				
c) <i>Documented compliance with applicable statutes and authorities, in particular those cited in §§58.5 and 58.6?</i>				
d) <i>Written determinations in those cases in which the recipient claims that projects or activities are "exempt" under §58.34 or "categorically excluded" under §58.35?</i>				
e) <i>Finding of No Significant Impact (FONSI)? (If a negative response is based on the fact that the recipient found that a significant impact may occur, please go to number 4 below to continue the review)</i>				
f) <i>Copy of published Notice of FONSI or a Combined Notice of FONSI and Notice of Intent to Request a Release of Funds (NOI/RROF)?</i>				
g) <i>Copy of published of NOI/RROF or a Combined Notice of FONSI and NOI/RROF?</i>				
h) <i>Form HUD 7015.15, Request for Release of Funds and Certification?</i>				
i) <i>HUD 7015.16, Notice of Removal of Grant Conditions signed and dated by HUD, indicating that at least 15 days were allowed for objections?</i>				
4. Do records show that:				
a) <i>With the exception of exempt activities, no grant funds were obligated or spent prior to the receipt of the HUD 7015.16 (or the date specified in the HUD 7015.16, if earlier)?</i>				
b) <i>With the exception of categorically excluded activities determined to be exempt under the provisions of §58.34(a)(12), no physical development activities began prior to the receipt of the HUD 7015.16 (or the date specified in the HUD 7015.16, if earlier)?</i>				

Tribes Assuming Environmental Review Responsibilities	Yes	No	N/A	Recommendations/ Notes
c) <i>Identify the source of the information used to answer 4a and 4b.</i>				
<b>Open Findings</b>				
5. Are there any open findings in this area identified by either HUD and/or auditor?				
a) <i>If yes, summarize the finding(s):</i>				
b) <i>What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)?</i>				
c) <i>What is the current status of the finding(s) as of the date of this evaluation?</i>				
d) <i>What is the tribe's/TDHE's target date for responding to HUD or auditor findings?</i>				

Reviewer \_\_\_\_\_ Date of Review \_\_\_\_\_

**Tribes Declining Environmental Review Checklist for Program Year \_\_\_\_\_**

<b>Tribes Declining Environmental Review Responsibilities</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
1. Did you either supply HUD in a timely manner all available, relevant information necessary for HUD to perform for each property any environmental review required by 24 CFR Part 50 <b>or</b> prepare for an Environmental Assessment for HUD review and evaluation?				
2. (If applicable) Did you carry out mitigating measures required by HUD as a consequence of its review?				
3. (If applicable) Did you select an alternative property rather than carry out mitigating measures?				
4. Did you not acquire, rehabilitate, convert, lease, repair or construct property, nor commit local funds for these program activities with respect to any eligible property until HUD approval of the property was received?				
<b>Open Findings</b>				
5. Are there any open findings in this area identified by either HUD and/or auditor?				
a) <i>If yes, summarize the finding(s):</i>				
b) <i>What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)?</i>				
c) <i>What is the current status of the finding(s) as of the date of this evaluation?</i>				
d) <i>What is the tribe's/TDHE's target date for responding to HUD or auditor findings?</i>				

Reviewer \_\_\_\_\_ Date of Review \_\_\_\_\_

**Audit Report Checklist for Program Year \_\_\_\_\_**

<b>Audit Report Checklist</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
1. Do you review expenditures from all federal funding sources at the end of your fiscal year to determine if they exceed \$300,000 and require submission of an audit?				
2. When an audit is required, is the final audit report prepared within 9 months after the end of the fiscal year?				
3. Do you provide necessary information to the auditor and review the audit to ensure it reports on all programs, liabilities, assets, etc.?				
4. Is the audit report sent to the Federal Audit Clearinghouse and HUD within 9 months after the end of the fiscal year?				
5. Is the audit report sent to HUD with the APR?				
6. Do you distribute the audit report among the Board and senior management to discuss the findings and their implications?				
7. Do you respond to all audit findings to ensure timely resolution?				
8. If TDHE, was a copy of your audit submitted to Tribe?				

Reviewer \_\_\_\_\_

Date of Review \_\_\_\_\_

**Financial Health Assessment Checklist for Program Year \_\_\_\_\_**

<b>Financial Health Assessment Checklist</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Recommendations/ Notes</b>
<b>General</b>				
1. Did you calculate figures for all six indicators?				
2. Do the results you calculated indicate a need to make changes in operations?				
3. If yes, have you planned changes to your operations?				
<b>Timely Use of Funds</b>				
4. Do you obligate at least 90% of your grants within two years?				
5. Are you obligating and expending your oldest grants first?				
6. Do you have specific activities planned appropriate to the size of your open grants?				
<b>Current Ratio</b>				
7. Do you include only current assets and current liabilities in your current ratio calculation?				
<b>Tenant Receivable Outstanding</b>				
8. Do you communicate to new & existing tenants the consequences of paying rent late?				
9. Do you enforce your late payment policies, including eviction?				
<b>Occupancy Loss</b>				
10. Do long delays occur between one tenant moving out and the next tenant moving in?				
<b>Management Expense per Unit</b>				
11. Have you excluded administrative expenses for special projects (salaries, materials) from your management expense total?				
12. Do inefficient processes contribute to a high management expense per unit?				
<b>Net Operating Income</b>				
13. Do you use fictitious stand-in rents, rather than real rents in your calculation?				
14. Do you use the same or very similar stand-in rents for each year's calculation?				

Reviewer \_\_\_\_\_

Date of Review \_\_\_\_\_

**Physical Assessment Checklist for Program Year \_\_\_\_\_**

Physical Assessment Checklist	Yes	No	N/A	Recommendations/ Notes
<b>Inspection Policy and Procedures</b>				
1. Is there a written policy on inspections readily available to staff?				
2. Are there procedures to ensure that all units are inspected on an annual basis?				
3. Are there procedures to notify tenants of upcoming inspections?				
4. Are there procedures to ensure inspection results are stored and directed to the appropriate department/person for follow up (e.g., maintenance, capital planning, preventative maintenance)?				
<b>Set of Inspection Standards</b>				
5. Is there a set of inspection standards used to determine inspection deficiencies?				
6. Do the inspection forms refer to the standards to help the inspector classify and rate deficiencies?				
7. Do the standards allow the inspector to highlight health and safety concerns as opposed to less urgent concerns?				
8. Is the inspection staff trained in the standards to help standardize results?				
9. Do inspection forms have space for the inspector input regarding tenant treatment of the property?				
<b>Tracking Mechanism and Inspection Schedule</b>				
10. Is there a mechanism for tracking and scheduling inspections for all units?				
11. Do inspectors follow the schedule and update the tracking system after inspections?				
<b>Maintenance Follow-Up</b>				
12. Do you have a written policy readily available to tenants and staff that describes maintenance actions to fix deficiencies found after inspections?				
13. Does your policy clearly distinguish between repairs which must be paid for by tenants and repairs which are paid for by the grantee?				
14. Do inspection results reach the appropriate internal departments to take follow-up actions?				
15. Are procedures in place to give health and safety deficiencies found during inspections high priority?				

Reviewer \_\_\_\_\_

Date of Review \_\_\_\_\_

**Complaint Management Checklist for Program Year \_\_\_\_\_**

Complaint Management Checklist	Yes	No	N/A	Recommendations/ Notes
<b>How to Reduce the Number of Complaints</b>				
1. Do you have detailed and fair policies and procedures for your dealings with applicants, tenants, bidders, and contractors?				
2. Does your staff understand and follow your policies and procedures?				
3. Do you have quality control systems in place (e.g., inspections, work order tracking) to make sure you deliver what you promise?				
4. Do you adequately document your decisions (e.g., evictions, eligibility, procurements)?				
5. Do you provide opportunities to get feedback from residents (IHP planning meetings, APR review meetings, town hall meetings with Director, surveys)?				
<b>The Complaint Management Process</b>				
6. Are there easy ways for tenants to place complaints?				
7. Do you use a standard form to track complaints that includes information on response time and actions taken?				
8. Is there a clear workflow (e.g., a complaint designee in each department) and target timeframes for following up on complaints?				
9. Do you store completed complaint forms and analyze them for patterns?				
10. Has your staff been trained in the basics of customer service for listening and responding to complaints?				

Reviewer \_\_\_\_\_ Date of Review \_\_\_\_\_