

**Self-Monitoring Report for the Association of Village Council  
Presidents Regional Housing Authority for Fiscal Year 2017**

August 9, 2018

For:

AVCP RHA  
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By:

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## Introduction

This self-monitoring report for the Association of Village Council Presidents Regional Housing Authority (AVCP RHA) was completed on August 8, 2018. On July 9, 2018, I travel to Bethel, Alaska and met with Catherine Cedars, Program Manager; Bubba Palacios, Director of Development; Jeffery Lowrey, Vice President of Finance and other department heads. Later in the day I discussed housing activities with Mark Charlie, Chief Executive Officer.

The housing authority is a Tribally Designated Housing Entity (TDHE) authorized by 51 tribal governments within the Bethel and Kusilvak census areas. The housing authority main departments are Administrative Fund, Tribal Management (operations), Development, Modernization, Weatherization, NAHASDA Program and Organizational Totals.

The regional housing authority newest grant is the Veterans Affairs Supportive Housing (VASH) Program for homeless Native veterans. The program by the U.S. Department Veterans Affairs (VA) and U.S. Department of Housing and Urban Development (HUD) assists Veterans that are homeless find and sustain permanent housing. The HUD-VA Supportive Housing (HUD-VASH) Program has high qualifications for the case manager that oversees the program. AVCP RHA is working with two other regional housing authorities to find a case manager to oversee the housing authority HUD-VASH Program.

This is an independent assessment required under the Self-Monitoring Mutual Agreement (SMMA) between AVCP RHA and the Alaska Office of Native American Programs (AONAP). This report is for the fiscal year ending September 30, 2017.

## Administrative Capacity

AVCP RHA has the organizational capacity to execute all housing requirements under the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA). I met with numerous staff members and management personnel to assess the capabilities of the regional housing authority. Each individual was well informed of their duties.

AVCP RHA department heads meet monthly. Department offices have weekly staff meetings. There are joint meetings between departments to discuss ongoing projects, budgeting, funding, travel and inspections.

All employees have policy handbooks that are kept current through interoffice memorandums detailing program changes and revised federal codes. Staff members are well-informed regarding AVCP RHA policies and procedures.

## Housing Documentation

Documentation related to housing projects for Lower Kalskag, Stony River, Alakanuk and Chevak were examined. Construction, environmental reviews and delinquent accounts were evaluated. Studied information concerning AVCP RHA's grant under the Veterans Affairs Supportive Housing (VASH) Program for homeless Native veterans.

AVCP RHA gave me full access to documents. Below are samples of the documents reviewed during my investigation.

1. Personnel Policy Manual, amended on 5-19-17
2. By-Laws Policy Manual, adopted or amended on 6-11-12
3. Travel Policy Manual, adopted or amended on 6-11-12
4. Admissions and Occupancy Policy Manual, adopted or amended on 8-15-13
5. Applicant/Homebuyer Grievance Policy Manual, adopted or amended on 4-19-12
6. Finance Policy Manual, adopted or amended on 4-29-14
7. Procurement and Contract Administration Policy Manual, adopted or amended on 8-15-13
8. Conflict of Interest Policy Manual, adopted or amended on 4-19-12
9. Emergency Voucher Assistance Program, payment sheet, 2-10-14
10. Property Policy Manual, adopted or amended on 4-19-12
11. Development Policy Manual, adopted or amended on 3-28-05
12. Modernization and Special Projects
13. Village Allocation Program, 10-29-02
14. Self-Monitoring Policy Manual, amended 4-19-12
15. Rental Voucher Assistance Policy Manual, adopted or amended on 11-11-06
16. Very Low Income Housing Program Policy Manual, adopted or amended on 4-19-12
17. Home Mortgage Program Policy Manual, adopted or amended on 2-24-06
18. Emergency Voucher Assistance Program Policy Manual, adopted or amended on 8-15-13
19. Privately Owned Home Program Policy Manual, adopted or amended on 3-19-10
20. Credit Card Policy Manual, adopted or amended on 3-19-10
21. Enterprise Income Verification System Policy Manual, adopted or amended on 9-30-10
22. Education Housing Assistance Policy Manual, adopted or amended on 3-12-12
23. Relocation Policy Manual, adopted or amended on 5-21-12

AVCP RHA housing policies are date stamped, well written and available for tribal members. The TDHE has taken great care in developing and revising policies and procedures.

### Federally Required Documentation

AVCP RHA has copies of Office of Management and Budget circulars related to audits, Governmental Accounting Standard Board statements and interpretations and HUD guidelines and handbooks. The department has current CFR regulations covering NAHASDA, Indian Housing Plan (IHP), Indian Housing Block Grant (IHBG) and Indian Community Development Block Grant (ICDBG) programs

### Recommendations

AVCP RHA housing services are well managed by professional staff that receive adequate training. The housing authority has no compliance issues under HUD regulations.

Renters, homeowners and individuals purchasing homes owe AVCP RHA hundreds of thousands of dollars. Several individuals and families have not made payments to the housing authority in years. AVCP RHA sends delinquent accounts to a credit agency; however, the housing authority needs to address delinquent accounts in house.

Recommendation:

The Collection Policy needs to be strictly followed. The Collections Officer needs to have clear direction on how to address delinquent accounts and terminations.

## Annual Performance Report and Indian Housing Plan Monitoring

### Development Process and IHP Monitoring Self-Monitoring Checklist for Program

APR Development Process and IHP Monitoring	Yes	No	N/A	Information
1. Are activities consistent with the approved IHP?	x			
2. Is progress consistent with the one-year goals and objectives in the IHP?	x			
3. Is program progress consistent with progress reported in the APR?	x			Reviewed FY 2017 ARP
4. Is the number of low-income families being assisted consistent with the IHP?	x			
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?	x			
6. Is available data consistent with the TDHE's description of the housing market?	x			Housing information is updated on a regular basis
7. Is there evidence that the TDHE has coordinated NAHASDA activities with other governmental agencies?	x			Numerous: including AHFC, ANTHC, Veteran Affairs and other Alaska regional housing authorities
8. Is there evidence that the TDHE has coordinated with welfare agencies?	x			Tribal members sign a release of information form allowing AVCP RHA to contact public assistance and child welfare agencies
9. For 1937 Act units that have been demolished or disposed of, has one of the following conditions been met? a) A financial analysis was done and demonstrates cost-effectiveness; b) The unit was condemned by the government with authority over the unit; c) The unit was an imminent threat to the health and safety of residents; or d) Continued habitation of the unit was inadvisable due to cultural or historic considerations.			N/A	
10. Was HUD notified of any planned demolition or disposition prior to any action being taken?			N/A	
11. For disposition of 1937 Act units, were sale proceeds maximized or, alternatively, was the unit sold to a low-income Indian family?			N/A	
12. If 1937 Act units have been disposed of or conveyed, have they been reported as such for Formula Current Assisted Stock (FCAS) purposes?			N/A	

APR Development Process and IHP Monitoring	Yes	No	N/A	Information
13. Are financial resources other than HUD-funded grants available as stated in the IHP?	x			AHFC and Veterans Affairs
14. Has the TDHE executed a local cooperation agreement with all appropriate local governments?		x		Not required in unorganized Alaska boroughs pursuant to June 23, 2009, agreement
<p>APR Development Process and IHP Monitoring Notes:</p> <p>The Alaska Office of Native American Programs (AONAP), received AVCP RHA's FY 2017 Annual Performance Report on January 3, 2018.</p> <p>The AONAP approved AVCP RHA's May 3, 2017, amendments to the FY 2017 Indian Housing Plan.</p> <p>On August 22, 2016, the AONAP informed AVCP RHA the FY 2017 IHP was missing tribal certifications for the TDHE.</p>				

Reviewer: Bartz Englishoe

Date of Review: August 8, 2018

## Organizational Control Environment

### Organizational Control Environment Self-Monitoring Checklist for Program

Organizational Control Environment	Yes	No	N/A	Information
<b>Integrity and Ethical Values</b>				
1. Does TDHE maintain a written code of conduct or ethics?	x			Personnel Policy, 5-19-17
2. Is staff required to make annual confirmations that they understand and comply with the code of conduct?	x			Policy handbooks are assigned to employees, policy changes are detailed within interoffice memos
<b>Organization Structure and Reporting Relationships</b>				
3. Does TDHE have an organization chart?	x			A contact sheet with employee job titles is distributed in house and to the public
4. Are reporting lines clear to avoid duplicate responsibilities?	x			AVCP RHA has forms outlining specific tasks to avoid duplicating responsibilities
5. Is there the proper delegation of authority and responsibilities?	x			Employees know their responsibilities and AVCP RHA's chain of command
6. Does the organizational structure support internal controls?	x			Staff, managers, vice presidents and executive officers meet regularly
7. Is the staffing adequate?	x			
8. Is there evidence of frequent staff turnover?	x			Largest turnover is related to jobs requiring frequent travel to villages that causes individual to be separated from family members, traveling employees regularly get weather in
9. Is staff receiving adequate training?	x			AVCP RHA spent over \$50,000 for training in the fiscal year
<b>Organizational Bylaws</b>				
10. Does TDHE operate with Bylaws adopted by a Board of Commissioners (BOC)?	x			Reviewed BOC packets with bylaws and financial information
11. Are the Bylaws consistent with tribal ordinances and practices?	x			
<b>Governing Council</b>				
12. Are Board of Commissioners meetings held in accordance with the Bylaws?	x			Commissioners are active in the oversight of programs and regular reports are submitted to tribes
13. Are Board of Commissioners resolutions and minutes maintained and available for public access?	x			Authorizing resolutions are contained within binders for easy viewing
14. Are Board of Commissioners provided quarterly financial statements and progress reports?	x			Management provides both reports to BOC on monthly basis

Organizational Control Environment	Yes	No	N/A	Information
15. Does the Board of Commissioners maintain established criteria to evaluate the performance of the Director?	x			
16. Does the Council conduct a performance evaluation of the Director on an annual basis?	x			CEO evaluation was positive with strengths, improvements and goals, the BOC extended the CEO's employment contract
<b>Policies and Procedures</b>				
17. Do written policies and procedures exist that encompass personnel, financial management, procurement, and housing assistance program areas?	x			All procedures covered in individual policies, which are comprehensive and up-to-date
18. Is there an established process for documenting compensation comparability of staff positions?	x			
19. Are reimbursements for staff travel explicitly defined?	x			Staff must submit a travel request and produce a trip report, expenses are itemized for approval, credit cards receipts must be turned in promptly
20. Are personnel position descriptions accurate and current?	x			
21. Are records maintained for a period of 3 years from the last APR submission?	x			Records are boxed and stored in-house, the housing authority in the process of destroying outdated documentation
<b>Self-Monitoring Policy</b>				
22. Has a written self-monitoring policy been adopted?	x			Self-Monitoring Policy, 4-19-12
23. Does management monitor HUD grants without undue interference?	x			
24. Does the organization conduct self-monitoring on a regular basis?	x			Staff and management meet regularly
<b>Monitoring of Subrecipients</b>				
25. Are budgets established for subrecipient projects?	x			The subrecipients program is the Village Allocation Program, which require Tribal Work Plans (TWP)
26. Is there a written agreement with each subrecipient?	x			Tribes have agreements with the housing authority under authorized tribal resolutions
27. Does the contract or agreement clearly address or establish:				
a) statement of work?	x			Work plans outlined within TWP
b) an operating budget?	x			TWP have budgets
c) reporting requirements for self-monitoring?	x			TWP quarterly progress reports
28. Does TDHE monitor subrecipients on site at least annually or more often if the contract requires it?	x			HUD has stated subrecipients are managed in compliance with regulations

Organizational Control Environment	Yes	No	N/A	Information
29. Does TDHE follow up on any findings to assure that corrective measures or actions were taken?	x			Finding are reviewed by numerous staff and departments, including the executive office
Complaint and Grievance Resolution				
30. Does TDHE have written policies and procedures for addressing complaints and formal grievances?	x			Grievance Policy, 4-19-12
31. Is there a method to track complaints and formal grievances to ensure timely follow up and response?	x			Grievance files are reviewed by managers, staff and executive officers
32. Do formal grievance procedures provide for a hearing before an impartial hearing official or panel?	x			Three housing authority employees sit on the grievance committee
33. Is there a method to ensure that valid complaints and grievances are addressed to prevent reoccurrence?	x			
Open Findings				
Are there any open findings in this area identified by either HUD and/or auditor? NO				
a) If yes, summarize the finding(s): N/A				
b) What organizational unit has responsibility for clearing the finding(s)? N/A				
c) What is the current status of the finding(s) as of the date of this evaluation? N/A				
d) What is the TDHE target date for responding to HUD or auditor findings? N/A				
Organizational Control Environment Notes:				

Reviewer: Bartz Englishoe Date of Review: August 8, 2018



## Resident Eligibility and Service Standards

### Resident Eligibility and Service Standards Checklist for Program

Resident Eligibility and Service Standards	Yes	No	N/A	Information
<b>Statutory/Regulatory Requirements</b>				
1. Is adequate insurance coverage maintained on all TDHE units?	x			New units are identified three months prior to completion of construction for insurance coverage
2. Has the useful life been defined for all applicable units?	x			25 years for home mortgage units, 10 years for low income rental units, renovations increase useful life by one year for each \$10,000 expenditure
3. Are units receiving NAHASDA funding maintained as affordable during their useful life?	x			Maintenance manager and maintenance counselors keep units maintained through inspections, trip reports list maintenance requirements
<b>Eligibility</b>				
4. Is there a written policy on family income eligibility readily available to staff and posted for public access?	x			Intake specialists assist with eligibility and housing applications, tribes certify tribal membership
5. Are the most current HUD-determined income limits being used for eligibility criteria?	x			
6. If no, have no more than 10% of IHBG funds been used to assist families whose incomes fall within 80% to 100% of median income?			N/A	
7. Are only low-income Native American families determined eligible?	x			
8. Is the TDHE in compliance with the requirements, no exceptions?	x			
If there are exceptions, why? (e.g., non-low-income families require HUD approval, N/A)				
9. 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?			N/A	
10. Does the family income eligibility review include rent-paying habits and/or credit checks?	x			Mutual Help and low rent housing programs require applicants to authorized AVCP RHA to contact creditors and landlords
11. Are applicants adequately counseled on IHBG requirements?	x			Occupancy specialists and maintenance counselors work with tribal members before and after move-ins to clarify family obligations
12. Is the waiting list adequately maintained, documented and dated with offers?	x			Waiting list is updated on a continuous basis

Resident Eligibility and Service Standards	Yes	No	N/A	Information
13. Are applicants determined to be "ineligible" notified of reasons and options available to them?	x			Pre-application credit checks and criminal records are evaluated to determine ineligibility, which are reviewed and signed off by <ul style="list-style-type: none"> <li>• Intake Specialist, • Rental Manager</li> <li>• Housing Manager, • VP of Operation</li> </ul> applicants receive written notice of ineligibility
<b>Selection</b>				
14. Is there a written policy on eligibility available to staff and posted for public access?	x			Reviewed 2017 vacancy data. The BOC has discussed the slow turnaround process for moving families into unoccupied housing
15. Are the admissions of selected participants documented to reflect compliance with policies?	x			
16. Are incomes verified to be within the income limits prior to execution of a housing assistance contract or agreement?	x			Staff verify applicant income, seasonal work, Social Security benefits, dividends and debt
17. Are all "contracts for housing assistance" between the TDHE and the participant signed and dated and maintained in a unique confidential household file?	x			Maintained according to policy, files are secured in locked filing cabinets, staff is committed to confidentially
18. Are selected participants counseled on their housing assistance responsibilities?	x			Housing packets contain: <ul style="list-style-type: none"> <li>• lease agreement</li> <li>• rules and regulations</li> <li>• HUD form documents</li> <li>• grievance policy</li> <li>• inspection report</li> <li>• key policy</li> <li>• electric usage form</li> <li>• photo release form</li> </ul> family responsibilities are outlined during move-in conferences
<b>Rent and Payment Determination Checklist</b>				
19. Is there a written policy on rent and payment determination readily available to staff and the public?	x			
20. Are payments calculated according to policy requirements?	x			
21. Are all IHBG-assisted families paying 30% or less of their annual income for housing assistance?	x			
22. Are verifications of income properly documented in individual files?	x			Staff verify applicant's income, Social Security benefits, dividends and debt
23. Does TDHE have a written occupancy policy that:				

Resident Eligibility and Service Standards	Yes	No	N/A	Information
a) Does not contain unreasonable terms or conditions?	x			Admissions and Occupancy Policy and Intake Policy, employees take Certified Occupancy Specialist training
b) Require the owner or manager to maintain the housing in compliance with applicable housing codes and quality standards?	x			Property Policy, 4-19-12, owners are counseled on home occupancy and maintenance responsibilities
c) Require the owner or manager to give adequate written notice of termination of the lease, which shall be the period required under state, tribal, or local law?	x			Delinquent account families are issued four notices
d) 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?	x			The collection policy details failure to meet financial obligations. Delinquent participants are issued a 1) Reminder 2) Notice of Breach, 3) Notice of Termination and Suspension of Services and 4) Notice of Quit, reviewed samples of 2017 past due notices sent to housing occupants
e) Requirement that the owner or manager may not terminate the tenancy, during the term of the lease, except for serious or repeated violations of the lease and violation of applicable federal, state, tribal, or local laws?	x			AVCP RHA works with tenants to address issues before terminating lease
f) Provide 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.	x			
g) 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?	x			
h) Threatens the health or safety of, or right to peaceful enjoyment of the premises by, persons residing in the immediate vicinity of the premises?	x			
i) Criminal activity (including drug-related criminal activity) on or off the premises?	x			Leases have been terminated because of marijuana use
<b>Maintenance and Inspections/Management</b>				
24. Are all participant files properly documented per policy?	x			
25. Are inspections of applicant units fully completed and documented in files?	x			Occupancy specialists and maintenance counselors have detailed files, there are final construction and move-in inspections
26. For Rehabilitation programs:				
a) Have policy standards for the type, cost-effectiveness and cost of rehabilitation of a home been followed?	x			AVCP RHA distributes move-in orientation material

Resident Eligibility and Service Standards	Yes	No	N/A	Information
b) Was the Scope of Work (work order) for rehabilitation completed within budget and timeframes for each unit?	x			Development department has well documented binders with budgets, schedules and work orders
c) Is there follow-up on rehabilitation work completed to ensure quality workmanship?	x			Several inspections are used to ensure workmanship
27. For homeownership programs:				
a) Have policy standards for the type, cost-effectiveness and cost of new homes been followed?	x			AVCP RHA uses Alaska suitable housing designs that have been perfected over time, designs have detailed material lists
b) Was the Scope of Work (work order) for new construction completed within budget and timeframes for each unit?	x			Work orders outline job description and tasks, payment requests are approved by the Development Department, Finance Department and executive office, project budgets are approved by BOC
c) Is there follow up on construction work completed to ensure quality workmanship?	x			Several inspections are conducted, AVCP RHA has move-in, move-out, annual, semi-annual, probationary, follow-up and special inspections
d) Are post-occupancy inspections conducted?	x			Six months and one-year follow-up inspections
Public Dissemination				
28. Does TDHE have a written eligibility policy that is publicly available?	x			
29. Does TDHE have a written selection policy that is publicly available?	x			All employees have a policy handbook
30. Does TDHE have a written rent or payment determination policy that is publicly available?	x			
31. Does TDHE have a written occupancy policy that is publicly available?	x			Admissions and Occupancy Policy, 8-15-13, employees take Certified Occupancy Specialist training
32. Does TDHE have a written maintenance policy that is publicly available?	x			Property Policy, 4-19-12
33. Does TDHE have a written grievance policy that is publicly available?	x			Applicant/Homeowner Grieve Policy, 8-15-13
34. Does TDHE have a written collections policy that is publicly available?	x			
Collections				

Resident Eligibility and Service Standards	Yes	No	N/A	Information
35. Are all provisions of the TDHE collections policy enforced consistently?	x			The following notices are mailed to families with delinquent accounts: 1) reminder, 2) notice of breach, 3) notice of termination and suspension of services and 4) notice of quit, Authority keep detailed records of delinquent accounts
36. Are delinquency notices sent out consistently at the beginning of each month?	x			Housing authority waits two weeks before notices are mailed to receive payments that may be interrupted by weather and post office delays
37. Does TDHE support collection efforts for delinquent payments?	x			
What is the current balance for delinquencies from assisted households? Over \$500,000				
38. Is this an increase within the last six months?	x			Increased from last fiscal year
Lead-based paint				
39. Are you assisting dwelling units constructed before 1978? If no, please proceed to question 47.	x			
40. Have these dwelling units been visually inspected for defective paint surfaces by a qualified lead-based paint inspector?			N/A	
41. Did the inspection find any defective paint surfaces?			N/A	
42. If yes, were such surfaces treated within 30 calendar days of the visual evaluation?			N/A	
43. 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)?			N/A	
44. 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?			N/A	
45. If yes, have the paint surfaces been treated within 30 days of the paint testing report?			N/A	
46. Has TDHE taken appropriate action to protect residents and their belongings from hazards associated with treatment procedures?			N/A	
Temporary Relocation/Acquisition				

Resident Eligibility and Service Standards	Yes	No	N/A	Information
47. Does TDHE inform the owner of the amount you believe to be the fair market value of the property before discussing the purchase price?	x			
48. Does TDHE have the property appraisal prepared by a qualified appraiser?	x			Invitations to bid are used to select appraisers
49. Does TDHE inform the owner that the housing authority would be unable to acquire the property if negotiations fail to result in an amicable agreement?	x			
50. If 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?			N/A	
51. Does TDHE 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?	x			
52. Does TDHE provide temporarily relocated residential tenants and homebuyers with reimbursement for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation?	x			
Does TDHE provide temporarily relocation for tenants and homebuyers with reasonable advance written notice? YES				
a) The date and approximate duration of the temporary relocation?	x			
b) The location of the suitable, decent, safe, and sanitary dwelling to be made available for a temporary period?	x			
c) The terms and conditions under which the tenant may occupy a suitable, decent, safe, and sanitary dwelling in the complex following completion of the repairs?	x			
d) The provisions for reimbursement?	x			
53. 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?	x			
54. Does TDHE certify that the Uniform Relocation Assistance the regulations at 49 CFR part 24, and the requirements of 24 CFR §1000.14?	x			
55. Does TDHE maintain records in sufficient detail to demonstrate compliance with these regulations?	x			
Open Findings				
Are there any open findings in this area identified by either HUD and/or auditor? No				

Resident Eligibility and Service Standards	Yes	No	N/A	Information
a) If yes, summarize the finding(s): N/A				
b) What entity has been assigned the responsibility for clearing the finding(s)? N/A				
c) What is the current status of the finding(s) as of the date of this evaluation? N/A				
d) What is the target date for responding to HUD or auditor findings? N/A				
<p>Resident Eligibility and Service Standards Notes:</p> <p>There are many delinquent accounts for homeowners, buyers and renters. The housing authority needs to address this financial loss.</p>				

Reviewer: Bartz Englishoe

Date of Review: August 8, 2018

## Fiscal and Financial Management

### Fiscal and Financial Management Checklist for Program

Fiscal and Financial Management	Yes	No	N/A	Information
<b>Reporting</b>				
1. Are financial reports submitted in a timely manner?	x			
2. Is the TDHE notice-free (no notices from HUD on the accuracy of the reports submitted)?				
3. Does TDHE maintain access to the Electronic Line of Credit Control System (eLOCCS)?	x			
4. Do financial reports and statements present a clear picture of financial results and condition?				
5. Is data available for the preparation of reports on:	x			
a) Current month and year-to-date activities versus budget?	x			Reviewed the September 2017 actual to budget spreadsheets
b) Current month versus same month prior year actuals?	x			
c) Current year-to-date versus prior year-to-date?	x			
d) Exception reporting of variances in excess of predefined percentage or dollar amount?	x			
<b>Audits</b>				
6. Does TDHE maintain all information/data needed for an annual audit?	x			AVCP RHA manages finances and budgets by using: <ul style="list-style-type: none"> <li>● Capital projects accountant</li> <li>● Account technicians</li> <li>● General ledger accountant</li> <li>● Payroll administrator</li> </ul> Reviewed 2017 financial information submitted to BOC
7. Did TDHE submit annual audits in a timely manner?	x			AVCP RHA submits its audit to the Federal Audit Clearinghouse within the required 9 months
8. Does TDHE prepare in advance for annual audits?	x			
<b>Budget</b>				
9. Have detailed budgets been estimated for each activity?	x			Budgets are reviewed by several departments and requires numerous approvals



Fiscal and Financial Management	Yes	No	N/A	Information
10. Do accounting records allow and provide for the comparison of actual expenditures with budgeted amounts for each grant?	x			Analyzed September 2017 statement comparing year-to-date budgeted to actual expenditures
11. Is there evidence that grants are periodically (at least once a quarter) compares actual to budgeted expenditures?	x			Produced monthly, AVCP RHA is able to provide budget to actual reports for current grants and projects
12. Do accounting records include tracking of expended/unexpended and obligated and unobligated balances?	x			
13. Are program budgets revised and approved, when necessary, in accordance with program requirements?	x			
Does a regular budget control review occur, covering the following areas:				
14. Administrative expenses?	x			
15. Labor overtime?	x			Overtime is monitored through Request for Overtime form requiring two signatures
16. Direct and indirect labor?	x			
17. Do managers of all the various affected functions of the organization participate in the development of budgets?	x			Monthly meetings and regular interoffice communications
18. Is adequate information available at the time budgets are prepared in order to develop meaningful budgets?	x			
19. Is data reported against budgets accurately (if actual) or fairly (if allocated)?	x			
20. Does TDHE have a separate budget and separate accounts for IHBG funds?	x			All accounts are itemized separately and are in one bank account
Drawdowns				
21. Does the release of the check for payment of program costs occur within 3 days of the deposit of funds?	x			
Are Request Vouchers for payment:				
22. Prepared?	x			
23. Accurate?	x			
24. Documented?	x			
25. Are internal controls for requesting funding followed?	x			
Accounting Records Checklist				
Do the accounting records adequately identify the source and application of funds provided in the following areas:				

Fiscal and Financial Management	Yes	No	N/A	Information
26. Obligations?	x			
27. Unobligated balances?	x			
28. Assets?	x			
29. Liabilities?	x			
30. Outlays/expenditures?	x			
31. Income?	x			
32. Subrecipient awards or obligations?	x			
33. Are cash receipts/cash disbursement journals current and accurate?	x			
34. Are bank statements reconciled monthly and in a timely manner?	x			
35. Are bank reconciliations free of discrepancies?	x			
36. If discrepancies exist, are they investigated and resolved?	x			
<b>Internal Controls</b>				
37. Is there segregation of duties in terms of financial transactions?	x			AVCP RHA, staff includes: <ul style="list-style-type: none"> <li>• Capital projects accountant</li> <li>• Account technicians</li> <li>• General ledger accountant</li> <li>• Payroll administrator</li> </ul>
38. Does TDHE have a policy on who can authorize payments?	x			Two, three and four signatures are required depending on type and amount of payment
39. Are all disbursements accompanied by adequate documentation, in the form of receipts or an invoice?	x			Reviewed paper files containing invoices, authorizations and checks
<b>Cash Management — Cash Receipts</b>				
40. If the cash receipts process is computerized, is system security adequate?	x			Residents paying rent with cash are issued numbered receipts
41. Is there adequate separation of responsibility in the receipt, recording, and deposit of cash receipts?	x			
42. Are cash funds secured?	x			
43. Are all funds deposited at least weekly?	x			
44. Are pre-numbered cash receipts in numerical order?	x			

Fiscal and Financial Management	Yes	No	N/A	Information
45. Are all cash receipts accounted for?	x			
46. Are deposit slips free of erasures or alterations?	x			
47. If staff handling cash transactions have been replaced within the last 6 months, were appropriate security measures taken regarding former employees; e.g., eLOCCS authority, safe combinations?	x			
48. Are there employee IOU notes or personal checks (exclusive of cash receipts for legitimate housing payments)?		x		
<b>Cash Disbursements</b>				
49. Are all disbursements, except those from petty cash, made by pre-numbered checks?	x			
50. If program income is received, is this income disbursed on affordable housing activities?	x			
51. Are all expenditures supported by invoices, contracts, purchase orders, etc.?	x			
52. Are all direct salaries and wages of employees supported by time cards?	x			
53. Do time distribution records support direct salaries that are prorated?	x			
54. If the cash disbursements system is computerized, is the system security adequate?	x			
55. Are all checks in order (i.e., not missing, voided, or altered)?	x			
56. If authorized, do petty cash and/or change fund(s) reflect what is on the general ledger?	x			
57. Are cash counts conducted randomly and regularly?	x			
58. Do the on-site cash counts of petty cash and/or change fund show that these are free of discrepancies?	x			Petty cash system is not used
59. Is there a written prohibition against signing checks in advance?	x			Finance Policy 4.10 prohibits the signing of blank checks
60. Do authorized persons approve all expenditures in advance?	x			Check request forms require several signatures
61. Are unpaid invoices maintained in an unpaid invoice file?	x			
62. Are invoices from unfamiliar or unusual vendors reviewed and approved for payment by authorized personnel who are independent of the invoice processing function?	x			

Fiscal and Financial Management	Yes	No	N/A	Information
63. If TDHE keeps an account payable register, are payments promptly recorded in the register to avoid double payment?	x			
64. 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?	x			
65. 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?	x			
66. Are advance payments to vendors and/or employees recorded as receivables and controlled in a manner which assures that they will be offset against invoices or expense vouchers?	x			
Investments/Banking				
67. Are IHBG funds in one or more accounts separate from other funds?	x			Each grant itemized separately within one bank account
68. Are accounts insured by an agency of the U.S. or fully collateralized to ensure protection of the funds even in the event of bank failure?	x			
69. Do you have an executed General Depository Agreement?	x			
70. Is cash in excess of immediate need identified and invested?	x			
71. Are funds invested in instruments or obligations that meet the requirements of 24 CFR §1000.58(a).	x			Reviewed audit information related to investments
Insurance				
72. Have the TDHE provided adequate insurance against loss from fire, weather and liability claims for all housing units you own or operate?	x			AVCP RHA maintains insurance for all housing units
73. Does TDHE require contractors and subcontractors to either provide insurance covering their activities or negotiate adequate indemnification coverage to be provided in their contract with housing authority?	x			Insurance and bonding is required at time of contract execution
74. Does the TDHE use an Insurance Register to track all insurance activity?	x			Staff members tracks fire and other damages, every claim is itemized for claim through Amerind Risk Management

Fiscal and Financial Management	Yes	No	N/A	Information
Allowable Costs				
75. Does TDHE conduct periodic check of expenditures to document that all expenditures are necessary and reasonable for proper and efficient administration of the program, as related to:				
a. Salaries and related costs?	x			
b. Administrative service contracts (e.g., legal, account, audit, consulting)?	x			
c. Travel expenditures?	x			
d. Other administrative costs?	x			
76. 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:				
a) Entertainment?	x			
b) Contributions and donations?	x			
c) Fines and penalties?	x			
d) General governmental expenditures including salary and expenses of staff and Commissioners?	x			
e) Other (Please Specify) N/A				
77. Does TDHE ensure that no costs related to political activities are charged to the IHBG program?	x			Not allowed
78. Does TDHE subtract all applicable credits before charging costs to the IHBG program?	x			
79. 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?	x			
80. Are indirect grantee costs charged to the IHBG program only with support from an indirect cost proposal/cost allocation plan?		x		AVCP RHA does not have an indirect cost proposal
81. If there is staff working on non-NAHASDA program activities, is the allocation of their salaries computed appropriately?	x			Staff use timesheets to allocate time to various grant activities, which are examined and authorized
82. Is the percentage of IHBG funds used for administrative costs the same as the percentage stated in the IHP?	x			
83. 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?	x			
Open Findings				

Fiscal and Financial Management	Yes	No	N/A	Information
Are there any open findings in this area identified by either HUD and/or auditor? No				
a) If yes, summarize the finding(s): N/A				
b) What entity (organizational unit) has been assigned responsibility for clearing the finding(s)? N/A				
c) What is the current status of the finding(s) as of this evaluation? N/A				
d) What is the TDHE's target date for responding to HUD or auditor findings? N/A				
Fiscal and Financial Management notes:				

Reviewer: Bartz Englishoe

Date of Review: August 8, 2018

## Procurement and Contract Administration

### Procurement and Contract Administration Checklist for Program

Procurement and Contract Administration	Yes	No	N/A	Information
<b>Procurement Planning</b>				
1. Does TDHE engage in periodic procurement planning, including independent cost estimates?	x			
<b>Conflict of Interest</b>				
2. Does TDHE have a written code of standards of conduct governing the performance of your employees engaged in the award and administration of contracts?				Procurement Contract Administration Policy, Section 13.2, prohibits employees or agents of AVCP RHA from participating directly or indirectly in the award and administrative of any contract where they may have a conflict of interest
<b>Small Purchases</b>				
3. Does TDHE staff document receipt of an adequate number of price or rate quotations from qualified sources for procurements of \$100,000 or less?	x			Reviewed Micro Purchase Order (Under \$5,000)
<b>Competitive Sealed Bids (Formal Advertising)</b>				
4. Did the staff receive at least two responsive bids from responsible bidders for each procurement transaction?	x			Reviewed 2016-2017 documentation on material requests, contacts and inventory, one RFP had six bids submitted
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?	x			
6. Did staff advertise the Invitation For Bid (IFB) in a publication of general circulation?	x			Several 2017 IFB files were reviewed, id notices are advertised in local Delta Discovery
7. Were bids solicited from an adequate number of potential bidders?	x			Reviewed site, civil and surveying RFP recommendations and meeting notes

Procurement and Contract Administration	Yes	No	N/A	Information
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?	x			IFBs are detailed, if a question arises, all bidders receive the answer, reviewed bidder instructions
9. Were all bids assessed against the same award evaluation criteria?	x			Bids are reviewed for <ul style="list-style-type: none"> <li>• Indian ownership</li> <li>• Employment and training opportunities for Native Americans</li> <li>• Work load</li> <li>• Quality control</li> </ul> Analyzed two 2017 FY bids
10. Were all bids opened publicly at the time and place stated in the IFB?	x			
11. Was the contract awarded to the lowest responsive and responsible bidder?	x			Yes, including Indian owned bidder points
<b>Competitive Proposals</b>				
12. Were competitive sealed bids used?	x			Assessed IFB and RFP submittal instructions, opening bid procedures and contracts
13. Were proposals solicited from an adequate number of qualified sources, consistent with the nature of the procurement?	x			Reviewed steel pipe piling installation RFP
14. Does staff publicize the RFP and honor reasonable requests by parties to compete to the maximum extent practicable?	x			If a IFB or RFP questions arise, all bidders receive an answer to the question
15. Do RFP/IFBs identify all significant evaluation factors, including price or cost where required, and their relative importance?	x			RFP bid scoring form is sent to bidders and is used to evaluate bids
16. Does staff conduct technical evaluations of the proposals received and documenting the selection of awardees?	x			Proposal evaluation methods are available for interested parties, administration meets with contractors if technical qualifications are similar
17. Do staff make awards to the most responsive proposal that is the most advantageous to the TDHE after price and other factors were considered?	x			



Procurement and Contract Administration	Yes	No	N/A	Information
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?	x			
Noncompetitive Proposals				
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 emergency was of such urgency to not permit use of competitive solicitation; or after solicitation of several sources, competition was determined inadequate?	x			
If the answer is No, did HUD give approval for use of this method? N/A				
Contractor Qualifications				
20. Does TDHE conduct 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?	x			
General Provisions/Procedures Checklist				
21. Were procurement procedures reviewed and evaluated for the following rationale:				
a) The selection of the method of procurement?	x			Bid Analysis form is used
b) The selection of contract type?	x			
c) The contractor selection or rejection?	x			
d) The basis for the cost or price of the contract?	x			
22. Is contract pricing always based on a method other than the "cost-plus-a-percentage-of-cost" method?	x			
29. Are purchase orders\contracts signed by an authorized official?	x			Purchase orders require more than one signature
30. Are items that are paid for and delivered consistent with the items contained in the corresponding purchase order and/or contract?	x			Staff checks inventory before it is loaded on the barge in Seattle, a contractor can be assessed liquidated damages for late delivery or missing materials
31. Are vendors paid in a timely manner once requested orders have been delivered, inspected, and accepted and for payment?	x			
32. Is a cost or price analysis performed in connection with every procurement action, including contract modifications?	x			Expenditures are reviewed by numerous staff
33. Were the contract provisions listed in 24 CFR §85.36(i) appropriately included in the grant-assisted contracts?	x			

Procurement and Contract Administration	Yes	No	N/A	Information
34. Can staff document a system of contract administration for determining the adequacy of contractors' performance?	x			RFP Bidder checklist: <ul style="list-style-type: none"> <li>• Bidder's qualification</li> <li>• Form of bid</li> <li>• Non-Collusive Affidavit</li> <li>• Bid Bond 5%</li> <li>• Acknowledgement of general conditions</li> <li>• Acknowledgement of specific conditions</li> <li>• Cost Breakdown by village</li> <li>• Summary of costs breakdown</li> <li>• Organizational flow chart, etc...</li> </ul>
35. If applicable, does staff show that the subrecipients are required to follow applicable procurement policies and procedures in the administration of their contracts and purchase orders?	x			
<b>Bonding and Insurance</b>				
36. If contracts have been awarded for construction under a grant program, did staff:				
a. Follow its own requirements relating to bid guarantees, performance bonds, and payment bonds for construction contracts or subcontracts valued at or below \$100,000?	x			Very detailed document binders
b. 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?	x			Reviewed performance and payment bond requirements
<b>Procurement Preferences</b>				
37. Does staff attempt to comply with Indian Preference requirements that support economic opportunities for low and very low-income persons who are residents of NAHASDA-assisted housing or who live in the village or region in which the programs are undertaken?	x			Bidders must submit a statement of Indian ownership/management with documentation
Do staff take affirmative steps to use minority-owned, and women-owned businesses in grant funded contracts such as:				
a. Including such businesses on solicitation lists whenever they are potential sources?	x			Local newspaper and posted public notices
b. Ensuring that such businesses, when identified, are solicited whenever they are potential sources?	x			
c. Dividing procurement requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by minority-women owned businesses?	x			
d. Requiring prime contractors to take affirmative steps under contracts to select small, minority-owned and women-owned businesses in grant funded projects?	x			Bidder evaluations include assessment of a company hiring policy and number of Indian employees

Procurement and Contract Administration	Yes	No	N/A	Information
Contract Administration				
38. Once a contract is awarded, does the AHTHA ensure that supplies, services, or construction under contract are performed in an acceptable manner?	x			Work order forms help keep track of services
35. Does TDHE notify the contractor promptly whenever unacceptable work is identified?	x			
36. Does TDHE only pay for acceptable work?	x			
Open Findings				
Are there any open findings in this area identified by either HUD and/or auditor? No				
a) If yes, summarize the finding(s): N/A				
b) What entity has been assigned the responsibility for clearing the finding(s)? N/A				
c) What is the current status of the finding(s) as of the date of this evaluation? N/A				
d) What is TDHE's target date for responding to HUD or auditor findings? Within HUD response times, if more time is required, written permission is requested to extend due date				
Procurement and Contract Activity notes:				

Reviewer: Bartz Englishoe

Date of Review: August 8, 2018

## Labor Standards and Contract Administration

### Labor Standards & Contract Administration Self-Monitoring Checklist for Program

Labor Standards and Contract Administration	Yes	No	N/A	Information
1. Does TDHE pay Davis-Bacon wage rates when required?	x			TDHE has tribally determined wages
2. Does TDHE pay HUD-determined wage rates when required?	x			
3. Does TDHE 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?	x			
4. Are 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?			N/A	
5. Is TDHE in compliance with HUD Handbook 1344.1, Rev-2, Chg-1?	x			
<b>Assessment of Labor Standards Administration</b>				
6. Are the following documents or information maintained:				
a) Labor standards enforcement files for each project?	x			
b) Construction start dates?	x			
c) Contract award dates?	x			
d) Contract bid specifications with labor standards provisions?	x			
e) Pre-construction conference minutes?	x			Bidder sign in sheet is used
f) Records pertaining to violations and wage restitution?	x			
g) Apprentice/Trainee registration records (as needed)?	x			
h) Records of employee interviews?	x			AVCP RHA conducts interviews for the Bethel residents; in villages Project Supervisors conduct interviews using employment applications and resumes; field crew interviewed by Field Project Supervisors
i) Certified payrolls maintained by project?	x			
j) Evidence of certified payroll review?	x			
k) Are Semi-annual Labor Standards Enforcement Reports submitted to HUD Labor Relations?			N/A	Exempt

Labor Standards and Contract Administration	Yes	No	N/A	Information
Labor Standards Compliance, Individual Construction Contracts				
List the contractors and dollar amounts for contracts reviewed. Compared current to prior contracts.				
a. <u>Specialty Supply, Inc., \$1,173,897</u> b. <u>McGraw Construction, LLC, \$1,234,735</u> c. <u>Bristol Engineers, \$341,033</u>				
Contract Documents				
7. Are the following elements included in each contract being reviewed?				
a) Project number designation	x			Contracts address services such as scope of work, deliverables, assumptions, weather delay provisions and insurance certification
b) Name of contractor	x			
c) Description of work	x			
d) Bid opening date	x			
e) Contract award date	x			Notice of award is issued
f) Contract amount (\$)	x			Notice to proceed is issued
g) Start of construction date	x			
Contract Documents				
8. Are the following documents included in the contract file?				
a) Proper wage decision in contract/specifications?	x			Indian Preference requirements, AVCP RHA used tribally designed wage rates
b) Labor standards provisions in the contract/specifications?	x			
c) Evidence of contractor eligibility verification?	x			
d) Additional classifications and wage rates processed as needed?	x			
Payroll Review				
9. Are payrolls submitted in a timely manner?	x			
10. Are payrolls signed by employer or authorized representative?	x			Payroll transactions require approved and signed timesheets
11. Are discrepancies/violations noted?	x			
12. Is there evidence of payroll review?	x			
13. Are discrepancies/violations followed through to full resolution?	x			

Labor Standards and Contract Administration	Yes	No	N/A	Information
Employee Interviews				
14. Were employee interviews conducted by the TDHE?	x			
15. Were a representative number of trades and workers covered?	x			All local hire, over 400 local workers were hired in FY 2017
Investigations and Enforcement				
16. Are worker complaints handled and resolved in a timely manner and investigations conducted where appropriate?	x			
17. Are escrow accounts established and funds withheld to cover labor standards violations?			N/A	
18. Are enforcement reports submitted to HUD where underpayments total \$1,000 or more?			N/A	
Force Account Construction				
19. Does TDHE 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?	x			Force account crews are from within region
20. Does TDHE have an adequate number of qualified workers to complete the planned work?	x			Staff is familiar with village workers and coordinate activities with tribes to identify workers and training requirements
21. Does TDHE have the necessary tools and equipment to complete the project on time and within budget?	x			Tools and equipment are labeled and inventoried with Tool/Equipment Check form
22. Does TDHE have a system to manage and maintain equipment and tools?	x			Reviewed scope of work checklist
23. Does TDHE have qualified staff and procedures to procure materials and manage material distribution and storage?	x			Very detailed material lists are provided.

Labor Standards and Contract Administration	Yes	No	N/A	Information
26. Does TDHE have an experienced project superintendent who can manage the project including budgets, schedules, contract management, material management, quality control, and problem resolution?	x			
27. Does TDHE have clear plans and specifications, which are reasonable in scope for development by force account?	x			AVCP RHA has a dependable work force
28. Does TDHE have arrangements for independent inspections to verify the quality of work and compliance with the plans and specifications?	x			Alaska Building Energy Efficiency Standards are used
29. Does TDHE have arrangements for independent monitoring of progress and costs to ensure the force account construction is on track?		x		Monitoring conducted by project managers, which are knowledgeable of the region and villages
30. Does TDHE have an adequate budget for contingencies to address unforeseen delays, the cost of changes and budget overruns?	x			Checklist details material inventory, tools delivered and inspection visits
31. Does TDHE have a management system to ensure compliance with labor requirements including the maintenance of records?	x			
32. Does TDHE have a budget and plan to resolve development deficiencies including warranty problems?	x			
33. Does TDHE have adequate loss and liability insurance, including workmen's compensation, property damage, builder's risk, and vehicular liability?	x			
<b>Open Findings</b>				
Are there any open findings in this area identified by either HUD and/or auditor? NO				
a) If yes, summarize the finding(s): N/A				
b) What entity (or organizational unit) has been assigned the responsibility for clearing the finding(s)? N/A				
c) What is the current status of the finding(s) as of the date of this evaluation? N/A				
d) What is tribe's target date for responding to HUD or auditor findings? N/A				
Labor Standard and Contract Administration Notes:				

Reviewer: Bartz Englishoe

Date of Review: August 8, 2018

## Environmental Review

### Environmental Review Checklist for Program

Tribes Assuming Environmental Review Responsibilities	Yes	No	N/A	Information
1. Is there a separate Environmental Review Record (ERR) for each project?	x			Yes
2. Was the current HUD-recommended (or an equivalent) format used for the ERR?	x			AVCP RHA uses an Environmental Review Record (ERR) Internal worksheet documenting 14 HUD and 14 NEPA environmental requirements, reviewed federal and state correspondence related to projects
3. Does each ERR contain the following:				
a) 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?	x			Reviewed numerous ERR reports
b) Evaluation of the effects of the project or the activities on the human environment?	x			Environmental checklist details 14 areas required for statutory compliance,
c) Documented compliance with applicable statutes and authorities, in particular those cited in 24 CFR § 58?	x			AONAP approved AVCP RHA FY 2017 request for the construction in Atmautluak and the release of funds for the project
d) Written determinations in those cases in which the TDHE claims that projects or activities are "exempt" under 24 CFR §58.34 or "categorically excluded" under 24 CFR § 58.35?			N/A	
e) Finding of No Significant Impact (FONSI)? (If a negative response is based on the fact that the TDHE found that a significant impact may occur, please go to number 4 below)	x			Reviewed Fish and Wildlife Services comments related to Spectacled eiders and Steller eider critical habitat near housing development
f) Copy of published Notice of FONSI or a Combined Notice of FONSI and Notice of Intent to Request a Release of Funds (NOI/RROF)?	x			
g) Form HUD 7015.15, Request for Release of Funds and Certification?	x			
h) HUD 7015.16, Notice of Removal of Grant Conditions signed and dated by HUD, indicating that at least 15 days were allowed for objections?	x			



Tribes Assuming Environmental Review Responsibilities	Yes	No	N/A	Information
4. Do records show that:				
a) 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)?	x			
b) Except for 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)?	x			
c) Identify the source of the information used to answer 4a and 4b.				Bubba Palacios, Director of Development
Open Findings				
Are there any open findings in this area identified by either HUD? NO				
a) If yes, summarize the finding(s): N/A				
b) What department has been assigned the responsibility for clearing the finding(s)? N/A				
c) What is the current status of the finding(s) as of the date of this evaluation? N/A				
d) What is the tribe's/TDHE's target date for responding to HUD or auditor findings? N/A				
Environmental Review Notes: AVCP RHA and the village of Kasigluk addressed the need for an Army Corps of Engineers Special General Permit for a proposed road that was over 2,000 feet in length. The village corporation identified an optional route that did not require the special general permit. The shorten road only required a general permit.				

Reviewer: Bartz Englishoe Date of Review: August 8, 2018

## Audit Report

### Audit Report Checklist for Program

Audit Report Checklist	Yes	No	N/A	Information
1. Does TDHE 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?	x			Yearly audits are sent to BOC
2. When an audit is required, is the final audit report prepared within 9 months after the end of the fiscal year?	x			
3. Does TDHE provide necessary information to the auditor and review the audit to ensure it reports on all programs, liabilities, assets, etc.?	x			
4. Is the audit report sent to the Federal Audit Clearinghouse and HUD within 9 months after the end of the fiscal year?	x			
5. Does TDHE sent audit report to HUD with the APR?	x			
6. Does TDHE distribute the audit report among the Board of Commissioners and tribes to discuss the findings and their implications?	x			
7. Does TDHE respond to all audit findings to ensure timely resolution?	x			
Audit Report Checklist Notes: No HUD audit finding for FY 2017				

Reviewer: Bartz Englishoe Date of Review: August 8, 2018

## Financial Health

### Financial Health Assessment Checklist for Program

Financial Health Assessment Checklist	Yes	No	N/A	Information
<b>Timely Use of Funds</b>				
1. Does TDHE obligate at least 90% of your grants within two years?	x			
2. Does TDHE obligate and expend oldest grants first?	x			
3. Are TDHE planned activities appropriate to the size of an open grants?	x			
<b>Current Ratio</b>				
4. Does TDHE include only current assets and current liabilities in your current ratio calculation?	x			
<b>Tenant Receivable Outstanding</b>				
5. Does TDHE communicate to new and existing tenants the consequences of paying their rent late?	x			Occupancy specialists, and maintenance counselors work with tribal members before and after move-ins to explain family obligations
6. Does TDHE enforce late payment policies, including eviction?	x			Four notices are mailed
<b>Occupancy Loss</b>				
7. Do long delays occur between one tenant moving out and the next tenant moving in?		x		BOC wants to shorten the time homes stay vacant
<b>Management Expense Per Unit</b>				
8. Does TDHE exclude administrative expenses for special projects (salaries, materials) from your management expense total?	x			
9. Do TDHE inefficient processes contribute to a high management expense per unit?		x		
<b>Net Operating Income</b>				
10. Does TDHE use fictitious stand-in rents, rather than real rents in your calculation?		x		Stand-in rents not used
11. Does TDHE use the same or very similar stand-in rents for each year's calculation?		x		
Financial Health Assessment Checklist Notes:				

Reviewer: Bartz Englishoe

Date of Review: August 8, 2018

## Physical Assessment

### Physical Assessment Checklist for Program

Physical Assessment Checklist	Yes	No	N/A	Information
<b>Inspection policy and procedures</b>				
1. Is there a written policy on inspections readily available to staff?	x			All staff have current policy handbooks
2. Are there procedures to ensure that all units are inspected on an annual basis?	x			
3. Are there procedures to notify tenants of upcoming inspections?	x			Occupancy specialists work with tenants
4. Are there procedures to ensure that inspection results are stored and directed to the appropriate department or person for follow up?	x			
<b>Set of inspection standards</b>				
5. Is there a set of inspection standards used to determine deficiencies during inspections?	x			Inspection forms are used
6. Do inspection forms refer to the standards to help the inspector classify and rate deficiencies?	x			Inspection form has 16 assessments categories
7. Do standards allow an inspector to highlight health and safety concerns as opposed to less urgent concerns?	x			
8. Is the inspection staff trained in the standards to help standardize results?	x			
9. Do inspection forms have space for inspector input regarding tenant treatment of the property?	x			Inspection forms have comment space, forms indicate how tenant treated property
<b>Tracking mechanism and inspection schedule</b>				
10. Is there a mechanism for tracking and scheduling inspections?	x			Work order requests
11. Do inspectors follow the schedule and update the tracking system after inspections?	x			
<b>Maintenance follow-up</b>				
12. Does TDHE have policies available for tenants and staff describing maintenance actions to fix deficiencies found after inspections?	x			Tenant reports document transactions, work orders describe deficiencies
13. Does TDHE policy clearly distinguish between repairs which must be paid for by tenants and housing authority repairs?	x			
14. Do TDHE inspection requirements reach the appropriate internal departments to take follow-up actions?	x			
15. Do TDHE procedures give health and safety deficiencies documented during inspections a high priority?	x			
Physical Assessment Checklist Notes:				

Reviewer: Bartz Englishoe Date of Review: August 8, 2018

## Compliance Management

### Complaint Management Checklist for Program Year

Complaint Management Checklist	Yes	No	N/A	Information
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