

2020 – OVERVIEW SELF-MONITORING RESULTS

This year Samish has continued using the self-monitoring plans for recipients, as provided by HUD on their website one the Grant Oversight and Monitoring page, to complete our required annual self-monitoring. During this year we completed the following monitoring plans as applicable to current Samish NAHASDA programs and any areas of non-compliance or improvements needed are noted:

A. APR & IHP Compliance

Issue: No areas of non-compliance or improvement noted.

Corrective Action Plan/Taken: N/A

B. Draft Lead-Based Paint

Issue: No areas of non-compliance or improvement noted.

Corrective Action Plan/Taken: N/A

Comment: The program has had difficulty finding one procedure or technique to verify age of the property due to our multiple county service; As an improvement to ensure that we have correctly identified the age of a home for lead-based paint determination, the Housing Director or the Lead Housing Support Specialist will be verifying the client file has a verification of the age of the home before they and as part of their approval of client inspections.

C. Environmental Review Compliance

Issue: No areas of non-compliance or improvement noted.

Corrective Action Plan/Taken: N/A

D. Organization & Structure

Issue: No areas of non-compliance or improvement noted.

Corrective Action Plan/Taken: N/A

Comment: Several program policy revisions are in draft form under review to strength program procedures.

E. Procurement & Contract Administration

Issue: We found that the current language in the Appeals Board Ordinance does not allow for outside vendor complaints, procurement disputes, or Indian Preference complaints to be addressed by the appeals board. As a result, we found the Tribe did not have the required policy in place to properly address disputes resolution in these instances.

Corrective Action Plan/Taken: Dispute Resolution policy clauses are now under review for inclusion in our procurement section under the Finance Policy and are expected to be reviewed by Tribal Council in the first quarter of 2021 for inclusion.

F. Section 504 Accessibility

Issue: No areas of non-compliance or improvement noted.

Corrective Action Plan/Taken: N/A

G. IHBG Self-Monitoring

Issue: No areas of non-compliance or improvement noted.

Corrective Action Plan/Taken: N/A

H. Admissions & Occupancy

Issue:

We identified a failure in both the publication of disclosure and the notification to area ONAP offices regarding a conflict of interest for two Rental Assistance clients in 2020. In both these occurrences, the client's intake and conflict identification took place at the onset of COVID19 and our transition to remote working from home operations.

Corrective Action Plan/Taken:

The program has now completed both the public disclosure of conflict and the notification to the NW ONAP office of the conflict as required. Although we are confident that this failure was due to the transition to remote operations due to the COVID19 pandemic and is not representative of our program operations, the program still chose to further strengthen our conflict-of-interest procedures. Going forward, conflict of interest will now be identified and processed as needed at client intake. The Admissions and Occupancy Coordinator will post the Public Notification and email a copy of such notice to our HUD Grants Manager at NW ONAP, and to Housing Director. The program will also be printing the evidence of the public disclosure posting and the email to ONAP and including it in the client file for documentation.

Comments:

The program was also advised that further policy work to include how conflicts will be managed, for both procurement and program activity, is advisable as a best practice in maintaining proper internal controls.

I. Financial & Fiscal Management (including Appendixes 1-8)

Issue: No areas of non-compliance or improvement noted.

Corrective Action Plan/Taken: N/A

Jenna Burnett

From: Jenna Burnett
Sent: Wednesday, February 3, 2021 2:57 PM
To: Sharon Paskewitz
Cc: Carey Thurston; Dana Matthews
Subject: 2020 Self-Monitoring result Report for APR
Attachments: 2020 – SELF-MONITORING RESULTS REPORT.pdf

Hi Sharon,

The completed 2020 NAHASDA Self-Monitoring Report is attached for your review and inclusion in the APR. Additionally, the final signed 2020 self-monitoring packets are available in the grant folder on the H-drive [HERE](#) at: Accounting/ Grants/ HHS/ Housing/ 41005 NAHASDA/ 2020/ 14 Monitoring/ Internal Monitoring.

I hope you have a great day!

Jenna

Jenna Burnett | Compliance Officer - Samish Indian Nation

Pronouns: She/Her/Hers

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