

## **2023 – 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. IHBG Self-Monitoring**

**Issue:** Self-Monitoring was completed late for 2022.

**Corrective Action Plan/Taken:** N/A

**Comments:** 2022 Self-monitoring was completed late. Quarter 4 and the following new year Quarter 1 have become increasingly difficult to schedule and dedicate time to reviewing and completing the Annual Self-Monitoring. 2023 experienced similar time constraints. Plans with Housing and Compliance for 2024 to spread out sections to review and complete starting in August with a final review of sections in December.

### **B. APR & IHP Compliance**

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

**Corrective Action Plan/Taken:** N/A

### **C. Organization & Structure**

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

**Corrective Action Plan/Taken:** N/A

**Comments:**

The Samish Indian Nation's new organizational chart was formalized January 1st, 2023. This change added Executive and Senior Director levels. Related to Housing, the Housing Director reports to the Essential Services Senior Director, who reports to the Citizen & Client Services Executive Director, who reports to the Chief Operations Officer. Additionally, a Performance & Quality Improvement Specialist was created, which reports directly to the Housing Director.

### **D. Admissions & Occupancy**

**Issue:** No areas of non-compliance.

**Corrective Action Plan/Taken:** N/A

**Comments:**

In 2021 conflict of interest process was updated to be completed during the annual recertification with all participants. In 2023 there were no instances of failure to disclose or missing conflict of interest.

An overall change was made to the methodology of the client file selection process or testing. After meeting with the ONAP self-monitoring trainer, Samish is adopting a file selection process which targets new client files during Admissions and Occupancy testing. This best practice focuses on catching errors (if any) upfront. Housing and Compliance find this new practice adequate since the Performance & Quality Improvement Specialist also completes reviews of files during recertification in addition to those performed during Self-Monitoring.

In 2024, Samish Indian Nation expects the Xwch'angteng Housing Program to beginning housing citizens. After all cottages are occupied, Samish Indian Nation will complete the self-monitoring review for this program by

reviewing all files (14 total). In subsequent years, 10 files will be selected. Following similar methodology as mentioned above, new or exited occupant files will be selected, then any occupant files that were not reviewed during the previous monitoring and finally a random pull to fill remaining slots. The purpose behind this strategy will be to catch all errors up front, ensure all exited files receive a final review and lastly ensure no files go more than 1 year without being tested.

#### **E. Draft Lead-Based Paint**

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

**Corrective Action Plan/Taken:** N/A

**Comments:**

Completed Corrective Action plan from 2021. The program now has updated form to clarify common areas are inspected for Lead-Based paint deterioration in residence built before 1978, where children under the age of 6 reside.

#### **F. Section 504 Accessibility**

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

**Corrective Action Plan/Taken:** N/A

#### **G. Procurement & Contract Administration**

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

**Corrective Action Plan/Taken:** N/A

**Comments:** No self-assessment required, Samish still uses the \$10,000.00 Micro purchase threshold

#### **H. Environmental Review Compliance**

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

**Corrective Action Plan/Taken:** N/A

**Comments:** Determination of Exemptions completed sign.

#### **I. Maintenance and Inspection)**

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

**Corrective Action Plan/Taken:** N/A

**Comments:** In 2023, there are no applicable items to review under the Maintenance and Inspection section. This is expected to change for 2024 when the new Xwch'angteng Housing Program begins. NAHASDA Maintenance and Inspection guidance documents have been provided to leadership to assist with policy development.

Completed By  Date: 03/06/2024

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