

2019 – 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

C. Environmental Review Compliance

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

Corrective Action Plan/Taken: N/A

Comment: Completed corrective action plan identified in 2018.

D. Organization & Structure

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

Corrective Action Plan/Taken: N/A

Comments: Housing Director will be working to implement a new procedure for evaluating criminal background check results in a standard way to create a more uniform system not reliant on the single case manager's interpretation; it is hoped this effort will better meet the needs of our community and also better identify criminal barriers in serving our community.

E. Procurement & Contract Administration

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

Corrective Action Plan/Taken: N/A

Comments: We do not currently directly address Indian Preference, Section 3, and protests and complaints, directly in our Finance Policy, but meet with requirements in our practices. A future revision of the Finance Policy is planned, and we will consider creating separate clauses within our Finance policy that specifically address these areas.

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 single failure in implementing procedure for a possible a conflict of interest for a Rental Assistance client that was the nephew of an employee. In this isolated occurrence, the client failed to disclose the conflict during their application process.

Corrective Action Plan/Taken:

The conflict of interest procedures per our policy were followed and declaration was published once discovered. In order to ensure clarity in this process for the future, the program has now included the full definition of immediate family in both the application documents for the client to review prior to their declaration and in the e enrollment verification form.

Comments:

Additionally, the Program will look offering clients rental insurance as an added benefit in 2020.

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

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

Corrective Action Plan/Taken: N/A

Comments: