LAC DU FLAMBEAU **CHIPPEWA HOUSING AUTHORITY**

**SELF-MONITORING POLICIES AND PROCEDURES**

Adopted and approved by CHA Board of Commissioners January 21, 2015 Resolution \_\_\_\_\_(15)

**LAC DU FLAMBEAU CHIPPEWA HOUSING AUTHORITY**

**SELF-MONITORING**

**POLICIES AND PROCEDURES**

**Policy Statement**

The governing body of the LDF Chippewa Housing Authority recognizes the fact that they are responsible for establishing a self-monitoring policy and conducting compliance assessments as required by Section 403 of the Native American Housing and Self-Determination Act of 1996 (NAHASDA) and 24 CFR 1000 Subpart F entitled “Recipient Monitoring Oversight, and Accountability”. This policy is to be utilized by the LDF Chippewa Housing Authority staff to monitor and assess the activities of the LDF Chippewa Housing Authority to ensure compliance with applicable Federal requirements and monitoring performance goals described in the LDF Chippewa Housing Authority’s Indian Housing Plan (IHP).

As the NAHASDA beneficiary, the Lac du Flambeau Tribe is responsible for monitoring programmatic and compliance requirements of the IHP and NAHASDA. Therefore, the LDF Chippewa Housing Authority will prepare periodic progress reports to submit to the Lac du Flambeau Tribe, along with the annual assessment, the Annual Performance Report (APR), and a copy of the fiscal audit conducted.

This policy is intended to establish an easy to use compliance assessment system that includes self-monitoring procedures to be used by the LDF Chippewa Housing Authority as a management tool in operating the LDF Chippewa Housing Authority as a property management business.

1. **Conducting Compliance Assessments**
2. **Approaches**

The Executive Director shall determine each year what approach to take in conducting self-monitoring compliance assessments in accordance with this policy. The Executive Director shall assure that the assessments are conducted with an objective and impartial perspective and that no one is reviewing their own work. The approaches that may be used to conduct the compliance assessments include, but are not limited to, the following:

1. Develop a Housing Assessment Committee comprised of staff, members of the governing body and/or council.
2. Procure the services of an outside third party who has the technical knowledge and experience in the areas being assessed.
3. **Method**

The LDF Chippewa Housing Authority has determined that the most effective method to conduct the self-monitoring compliance assessments may be achieved through the following method:

1. Interviews with managers and/or program administrators. The assessor shall complete the self-monitoring checklists that are included as an appendix to this policy by conducting one-on-one interviews with the respective managers or administrative personnel to obtain their insights into how they adhere to specific compliance questions. The assessor shall gather a sufficient amount of corroborating information to exercise his/her judgment in determining the consistency and degree of adherence to the applicable regulatory requirements.
2. **Monitoring Strategy and Plan**
3. The LDF Chippewa Housing Authority Executive Director shall develop and complete a Monitoring Plan each plan year, encompassing the following items:
4. The self-monitoring compliance assessments start and completion dates.
5. Approach to take to conduct and complete the different compliance assessments as described in Section 1.a.
6. Frequency of conducting and completing the compliance assessments (annually, semi-annually, quarterly).
7. Procedures to resolve any identified deficiencies or concerns.
8. The LDF Chippewa Housing Authority Executive Director shall provide a copy of the Monitoring Strategy and Plan to all staff and to the LDF Chippewa Housing Authority’s governing body. Any amended plans will be distributed to the same individuals.
9. **Areas to be Monitored for Compliance**
10. **List of Areas**
11. APR Development and IHP Monitoring
12. Organizational Control Environment
13. Resident Eligibility & Service Standards (Complaint Mgmt.)
14. Fiscal & Financial Management (Audits)
15. Procurement & Contract Administration
16. Labor Standards & Construction Management
17. Maintenance Management (Inspections)
18. **Additions to List**

The Executive Director may add any additional areas to the list as recommended by the governing body or any HUD notices, guidance’s, or guidebooks.

1. **Resolution of Noncompliance Areas and Issues**
2. **Recommendations**
3. If deficiencies are discovered during the assessments performed in accordance with these procedures, the Executive Director will establish a Performance Improvement Plan with target dates and corrective actions to ensure resolution and to prevent the recurrence of the deficiencies.
4. The Performance for Improvement Plan will be submitted to the LDF Chippewa Housing Authority’s governing body within 30 days of completion of the assessments.
5. **Oversight Responsibility**

The Executive Director will be responsible for providing oversight to ensure that all deficiencies are corrected and for concurring on the closure of each identified deficiency.

1. **Reporting**

The LDF Chippewa Housing Authority’s self-monitoring compliance assessment activities conducted in accordance with this policy shall be summarized in a report and presented to the Lac du Flambeau Tribe.

The self-monitoring compliance checklist is not required to be submitted with the APR; however, a summary of the self-monitoring activities should be included, along with the appropriate required responses on the APR form to demonstrate that the LDF Chippewa Housing Authority is in compliance with 24 CFR § 100.502.