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I. Purpose				
<p>The purpose of this review is to determine compliance with Section 203 of NAHASDA. The recipient is required to identify the manner in which it will protect and maintain the viability of the housing inventory developed under a contract between HUD and the recipient of IHBG funds pursuant to the United States Housing Act of 1937. The recipient must provide for the continued maintenance and efficient operation of such housing.</p> <p>Recipients are required to develop written policies defining the responsibilities of homebuyers, tenants, and the recipient for maintenance of units assisted with IHBG funds pursuant to NAHASDA Section 203(b) and (e).</p> <p>Section 403(b) of NAHASDA requires annual on-site inspections of NAHASDA-assisted units. Periodic monitoring-Not less frequently than annually, each recipient shall review the activities conducted and housing assistance under the Act. Such a review shall</p>	<p>NAHASDA, Sections 203(b) and (e) and 403(b)</p> <p>2 CFR Part 200.313(d)(4)</p>	<p>NAHASDA Guidance 2000-09</p> <p>Notice PIH 2012-45</p>		



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include an appropriate level of on-site inspection of housing in accordance with its policy.				
II. Pre-Visit Preparation				
<p>A. If available, review the following documents:</p> <ol style="list-style-type: none"> 1. Most recent IHP, approved IHP amendments, IHP amendments in process 2. Policies and procedures (see section III for review instructions) 3. Previous and current monitoring findings in the areas of maintenance and/or inspection of units 4. Previous self-monitoring report(s) 5. Previous and current 2 CFR Part 200 and OIG audits findings and/or work papers in the areas of maintenance and/or inspection of units 6. Corrective actions status for findings in either of these areas 7. Previous and current enforcement actions 8. Valid complaints in the areas of maintenance and/or inspection of units 8. Relevant correspondence regarding any of these areas 	NAHASDA, Sections 203(b) and (e) and 403(b)	Notice PIH 2012-45		



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B. The scope of work is based on the following steps:				
1. Review the sampling methods in the General Instructions for Monitoring Plans	24 CFR Part 1000.503(b) and (c)			
2. Select random sample of units to be inspected onsite from inventory records provided by recipient.				
a. The sample should be representative of a broad selection of housing stock (at least 10% of existing housing stock, if feasible. Refer to sampling methods in the general instructions.)				
b. Monitoring inspections must be compared with most recent monitoring report.				



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III. On-Site Review				
A. The first step is to use random sampling techniques to determine the tenant and homebuyer units and files to be reviewed. The Tribe/TDHE is required to maintain its units in accordance with Section 203(b) in order to provide the continued maintenance and efficient operation of the 1937 housing stock.	NAHASDA, Section 203(b) and (e)			
1. In the case of subrecipients, homes assisted with NAHASDA funds are subject to the statutory inspection/maintenance requirements of NAHASDA.				
a. On-site monitoring should include subrecipient housing stock as part of the sampling universe.				
2. NAHASDA requires that the recipient reserve and use for operating assistance such amounts as may be necessary to provide for the continued maintenance and efficient operation of such housing.				



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a. Review approved IHP maintenance and operation budgets to identify funding required by the recipient to address its maintenance and operations requirements.				
b. Are funds being obligated and expended for maintenance and operation as identified in IHP? (coordinate with Financial and Fiscal Management review, if necessary)				
3. Written policies on maintenance are required by NAHASDA.	2 CFR Part 200.313(d)(4)			
a. Does the recipient have a maintenance and inspections policy in place?				
b. Is the policy adequate, covering all statutory requirements? Review policies and procedures to determine whether they are compliant and adequate to ensure that the housing assets are maintained.				
c. Are maintenance management and staff aware of policy requirements?				



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d. Interview maintenance staff to determine whether the actual practices are in accordance with the written procedures and regulation/statute.				
4. During the review of procedures and interview of staff, establish whether the recipient has an adequate maintenance system to ensure that maintenance is performed, as required.				
a. Who is responsible for maintaining the maintenance system?				
b. How does the system operate?				
c. Does the system identify routine maintenance requirements?				
d. Does the system identify the routine maintenance schedules?				
e. Does the system provide for non-routine and emergency maintenance?				
f. Does the system track work orders from initiation to completion for both routine and non-routine maintenance?				



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g. Does the system track the hours and funds expended on each work order for the purposes of program income? Does the recipient bill tenant for charges when appropriate? (Coordinate with Financial and Fiscal Management review, if necessary. Funds must be tracked by unit to determine program income or proceeds of sale.)				
5. Determine whether there is an adequate system for tracking and completing work orders.				
a. Who is responsible for the preparation of work orders?				
b. Are work orders numbered and logged?				
c. Is there a backlog of work orders? How old is the oldest work order? Provide explanation of backlog.				
d. Are work orders approved prior to the initiation of work?				
e. Are work orders approved by someone of authority other than the person performing the work?				



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f. Does supervisor monitor work order progress to ensure completion?				
g. Test work order system activities against actual work accomplished to determine if the system is operating as intended:				
(1). Select random sampling of work orders (see general instructions)				
(2) Compare work orders to procurement activities (coordinate with procurement system review, if necessary)				
6. Does the recipient have a maintenance checklist to assist in inspecting units? The reviewer may use the checklist when inspecting each unit for recipient's compliance with its maintenance policy.				
a. If there are maintenance problems, determine if the problems are isolated or if there is a problem with poor inspections and follow-up maintenance.				



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7. Are inspections of units completed and fully documented in files?		NAHASDA Guidance 2012-45		
a. Review files of the units that were inspected on site.				
b. Locate in participant files pre- and post-occupancy inspection reports.				
c. Identify any work that was needed prior to occupancy.				
(1) Locate in work order system and/or participant's file work items that were identified during the pre-occupancy inspection.				
(2) Is there evidence that confirms that the work was completed prior to occupancy?				
d. Determine if planned work, resulting from inspection reports, is appropriately scheduled in the work order system.				
(1) Are there work orders maintained in a file for this work?				



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(2) Do the work orders identify the responsible party for payment, i.e., recipient or tenant (in some cases, homebuyer)?				
(3) Has work identified by inspections been completed?				
(4) Was required work completed satisfactorily?				
(5) Was it completed in a timely fashion?				
(6) If not completed timely, enlarge test sample to determine if problem is systematic or isolated to just a few cases.				
(7) If the resident is available, discuss repairs, satisfaction with work, timeliness, etc.				
(8) Do the files contain records to document that repairs were conducted as a result of the routine inspection?				



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(9) If not, determine if the problem is isolated with just cause or systemic, i.e., problems are widespread through the recipient's organization.				
8. Is there follow up on maintenance work completed to ensure quality workmanship (inspection reports, correspondence, etc.?)				
a. What does the recipient do to verify work quality and completion?				
b. Does the recipient properly evaluate the work quality and accurately track completion time?				
(1) Test a random sample of completed work orders.				
(2) Test work orders against the recipient's work order control system to ensure that the system is current and adequate to track open work orders.				
(3) If there are problems, identify if the problems are systemic or isolated cases.				



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9. Based on the results of the review, does the recipient have sufficient staff to meet the maintenance requirements for its existing housing stock?				
10. Does the recipient have excessive staff to meet the maintenance requirements for its existing housing stock? (Rule of Thumb: one full-time maintenance person for each 50 units, depending on local circumstances.)				
IV. Summary				
<ul style="list-style-type: none"> A. Summarize the results of the review in a work paper. B. Discuss significant issues with Supervisor. C. Develop findings, including questioned costs and corrective actions, as appropriate. D. Develop concerns because they could lead to a violation E. Develop report language, including any findings and concerns. F. If there are any major issues identified in this review and the recipient has approval to invest, determine if a withdrawal of investment authority should be recommended. 				



Office of Native American Programs

Maintenance and Inspection
Monitoring
Plan
RECIPIENT

Reviewer Name:	
Review Date(s):	