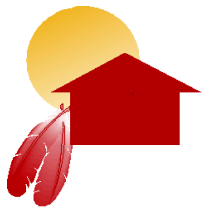
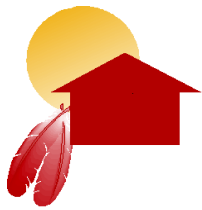


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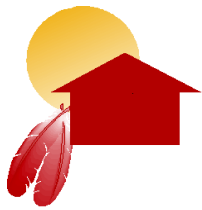
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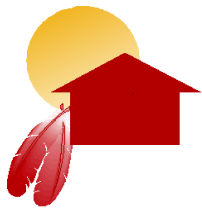
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
<b>I. Purpose</b>				
<p>The Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA) recognizes and promotes tribal sovereignty and self-determination in designing and operating housing programs. Title VI of NAHASDA enables HUD to provide 95% loan guarantees to private lenders so that federally recognized Indian tribes and Alaska Villages can leverage a portion of their annual IHBG allocation for NAHASDA eligible housing activities. HUD’s Title VI Guarantee is secured by a tribe’s/TDHE’s pledge of its current and future IHBG funding.</p> <p>The maximum loan guarantee is approximately <u>five times</u> a tribe’s or TDHE’s “Need” portion of its annual IHBG. A subsequent change in the Need portion will not affect an existing guarantee. HUD’s Office of Loan Guarantee is responsible for verifying that the limitations on the Guarantee amount comply with NAHASDA.</p> <p>Monitoring Title VI requires that projects funded in whole or in part under Title VI are included in reviews of all other applicable monitoring areas. Of particular concern is Admissions and Occupancy monitoring due to previous findings of ineligible participants in Title VI projects.</p>	<p>Title VI of NAHASDA</p> <p>24 CFR Part 1000, Subpart E</p>			



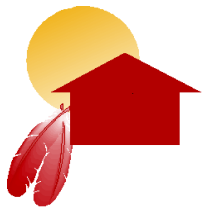
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<b>II. Pre-Visit Preparation</b>				
A. Prior to going on site, review the: <ol style="list-style-type: none"> <li>1. <i>Loan Guarantee by Regional Office</i> document in the Reports folder in the Document Library on the Title VI SharePoint site</li> <li>2. Project location</li> <li>3. Project description</li> <li>4. Estimated Title VI, IHBG, and ICDBG funds</li> <li>5. Latest IHP and APR</li> <li>6. Latest Self-Monitoring report</li> <li>7. Latest OMB A-133 audit</li> <li>8. Latest ONAP monitoring report</li> </ol>				
<b>III. On-Site Review</b>				
A. Consider the issues below when monitoring a Title VI project.  Project Development Files <ul style="list-style-type: none"> <li>• Environmental Review Record</li> <li>• Total Development Cost (TDC) Limitations</li> <li>• Local Cooperation Agreement</li> <li>• Davis Bacon Wage Determination</li> <li>• Relocation Requirements</li> <li>• Construction Contract (bidding, selection, award bonding, and payments)</li> </ul>				



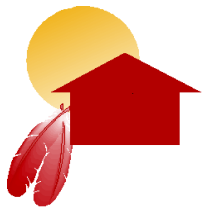
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<ul style="list-style-type: none"> <li>• Useful Life and Binding Commitments</li> <li>• Use of Title VI, IHBG and ICDBG Funds for Project</li> </ul> <p>Tenant/Homeowner Occupancy</p> <ul style="list-style-type: none"> <li>• Occupant Eligibility and Selection</li> <li>• Occupant File Documentation and Certifications</li> <li>• Payment and Collection Record</li> <li>• Unit inspections</li> </ul> <p>Compliance to Loan and Grant Terms</p> <ul style="list-style-type: none"> <li>• Compliance to Terms of Funding Agreements</li> <li>• Repayment Terms (accuracy of billing and payment on Title VI obligations)</li> </ul>				
<p>B. Are there any open monitoring finding(s) pertaining to the Title VI project?</p>				
<p>1. If yes, is there a Recommended Corrective Action(s) to close the finding(s)?</p>				
<p>a. If yes, has the due date(s) to close the monitoring finding(s) lapsed?</p>				
<p>C. Could the monitoring finding(s) negatively impact the tribe/TDHE's ability to manage the operation, and/or payment of debt service for the Title VI project(s)?</p>				



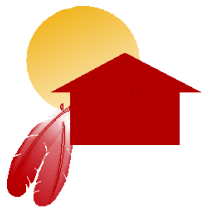
<b>RECIPIENT NAME:</b>	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
D. Are there any open audit finding(s) pertaining to the Title VI project?				
1. If yes, is there a Corrective Action Plan or Management Decision to close the finding(s)?				
a. If yes, has the due date(s) to close the audit finding(s) lapsed?				
E. Could the audit finding(s) negatively impact the tribe/TDHE's ability to manage the operation and/or payment of debt service for the Title VI project(s)?				
F. Is the tribe/TDHE current in its loan repayments to the lender?				
1. Do the financial statements document that the loan(s) is current?				
a. If the repayment is delinquent, determine why and when the next payment will be made.				
G. Verify how many Title VI units have been developed.				
H. If applicable, verify how many units are under development.				



<b>RECIPIENT NAME:</b>	<b><u>Regulatory/ Statutory Citation</u></b>	<b><u>Other Tools</u></b>	<b><u>Ref. Pg.</u></b>	<b><u>Remarks</u></b>
I. Does the current APR identify any outstanding performance issues with the tribe/TDHE's Title VI project?				
1. If yes, what are the outstanding performance issues?				
2. Verify that the number of units reported as completed in Section 3, Line 1.9 is correct.				
J. If the Title VI project(s) is still under development, is it on schedule?				
1. If not on schedule, determine why and the actions to be taken to complete the project(s)?				
K. Besides the Title VI pledge(s), is there any documentation that the tribe/TDHE is pledging additional IHBG funds? In other words, has the tribe/TDHE "double pledged" its IHBG funds?				
L. Does the tribe/TDHE have any current or proposed repayment agreements with HUD?				
1. If yes, is the tribe/TDHE current in its repayments to HUD?				



<b>RECIPIENT NAME:</b>	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
M. As part of the Financial and Fiscal Management monitoring, is there evidence that the tribe/TDHE did not use the Title VI funds in accordance with IHBG requirements?				
N. As part of the Maintenance and Inspection monitoring, include in the sample some Title VI properties. Note the following:				
1. Condition of the property				
2. Vacancy status				
O. As part of the Admissions and Occupancy monitoring, include in the sample some renters and/or owners of Title VI properties and determine if the occupants were eligible at the time of admission.				
P. If possible, take photographs of Title VI properties to document condition.				



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Q. Does the tribe/TDHE have any comments on the Title VI program?				
<b>IV. Summary</b>				
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.				

<b>Reviewer Name:</b>	
<b>Review Date(s):</b>	