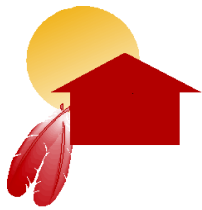
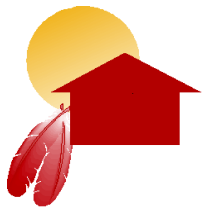


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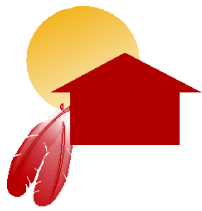
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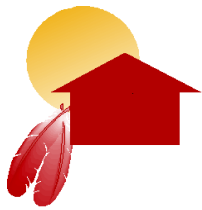
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| I. Purpose | | | | |
| <p>The Tribal HUD-VA Supportive Housing program (Tribal HUD-VASH) provides rental assistance and supportive services to Native American veterans who are homeless or at risk of homelessness living on or near a reservation or other Indian areas. HUD awarded grant funding to Indian tribes and tribally designated housing entities (TDHEs) to fund this rental assistance and associated administrative fees. Renewal funding may also be included. Indian tribes and TDHEs participating in this program must partner with the Department of Veterans Affairs (VA) to provide case management and supportive services to eligible Native American veterans.</p> <p>The purpose of the review is to determine whether the grantee has:</p> <ol style="list-style-type: none"> 1. Complied with the requirements of the Tribal HUD-VASH grant agreement, NAHASDA statute, IHBG regulations and other laws and regulations applicable to the Tribal HUD-VASH program; 2. Carried out its activities substantially, as described in its Implementation Plan and Mitigation Plan (if applicable); 3. Made substantial progress in carrying out its approved program, including receipt of adequate VA referrals and the quality of supportive services provided; | <p>Federal Register -78 FR 63822, October 21, 2015:</p> <p>Implementation of the Tribal HUD-VA</p> <p>Federal Register – 81 FR 87948, December 6, 2016:</p> <p>Implementation of the Tribal HUD-VA Supporting Housing Program; TECHNICAL CORRECTION</p> <p>2 CFR Part 200</p> | <p>Tribal HUD-VASH Guidebook</p> <p>Tribal HUD-VASH FAQs. Check for most recent update, as these are modified periodically.</p> <p>FAQs for Tribal HUD-VASH - Part 1</p> <p>FAQs for Tribal HUD-VASH – Part 2</p> | | |



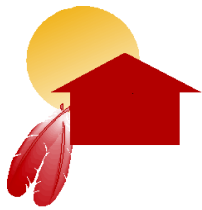
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| <p>4. A continuing capacity to carry out the approved activities in a timely manner.</p> <p><i>Generally, rental assistance under this program is subject to all requirements of NAHASDA that are applicable to rental assistance.</i></p> | | | | |
| <p>II. Pre-Visit Preparation</p> | | | | |
| <p>A. Prior to going on site, review the following:</p> <ol style="list-style-type: none"> 1. Tribal HUD-VASH Implementation Notice 2. Approved Tribal HUD-VASH Application detail 3. Tribal HUD-VASH Grant Agreement; 4. Tribal HUD-VASH Mitigation Plan, if applicable 5. Tribal Resolution 6. Tribal HUD-VASH Guidance(s) 7. Relevant correspondence 8. Project location(s) 9. Project description(s) 10. LOCCS disbursements 11. Latest IHP and APR 12. Latest Self-Monitoring report 13. Latest financial audit 14. Latest ONAP monitoring report 15. Previous and current enforcement actions 16. Valid complaints 17. Relevant correspondence | | <p>Tribal HUD-VASH Grant Agreement</p> <p>Tribal HUD-VASH Application</p> <p>Tribal HUD-VASH Mitigation Plan</p> | | |



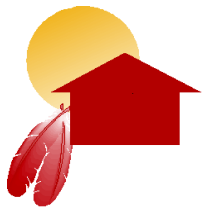
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| B. Review specifics: | | | | |
| 1. Implementation Plan | Federal Register - 78 FR 63822, October 21, 2015: Implementation of the Tribal HUD- VA Supportive Housing Program | | | |
| a. Staffing and Administration Plan | | | | |
| (1) Reporting plan | | | | |
| (2) Policies and procedures | | | | |
| (a) Written standards regarding registered lifetime sex offenders | | | | |
| b. Case Management Plan | | | | |
| (1) Location where services are provided | | | | |
| (2) Case Management service provider | | | | |
| (3) Service delivery plan | | | | |



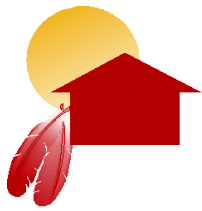
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| c. Type of Assistance | | | | |
| (1) Tenant-based or project-based | | | | |
| d. Partnerships | | | | |
| e. Reporting | | | | |
| (1) IHP/APR | | | | |
| (a) Separate activity | | | | |
| (b) Amendment required and submitted? | | | | |
| (c) Program description and budget information | | | | |
| (2) Program specific reporting tool HUD 50058 (Determine if the Tribe/TDHE is collecting the required information for future reporting.) | | | | |
| (3) Financial reporting | | | | |
| (a) Separate quarterly SF-425 (b) No investment authority | | | | |



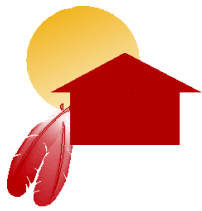
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| (c) Program income possible | | | | |
| (4) LOCCS | | | | |
| (a) Budget line items to be used | | | | |
| 1. 1606 Admin Fee | | | | |
| 2. 1640 RAP | | | | |
| (b) Is the grantee making consistent drawdowns from LOCCS? | | | | |
| 2. Determine if the grant has been amended, or if there has been a renewal award. | | | | |
| 3. Develop any additional review criteria based on the application. | | | | |
| C. Audit Findings | | | | |
| 1. Are there any open audit findings pertaining to the Tribal HUD-VASH project? | | | | |



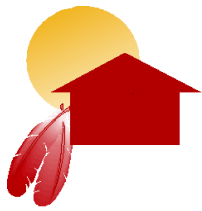
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| a. If yes, is there a Corrective Action Plan or Management Decision to close the finding(s)? | | | | |
| (1) If yes, has the due date(s) to close the audit finding(s) lapsed? | | | | |
| 2. Could the audit finding(s) negatively impact the tribe/TDHE's ability to manage the operation of the Tribal HUD-VASH project(s) | | | | |
| D. APR | | | | |
| 1. Does the current APR identify any outstanding performance issues with the tribe/TDHE's Tribal HUD-VASH project? | | | | |
| 2. If yes, what are the outstanding performance issues? | | | | |
| 3. Verify that performance data reported in Section 3, Line 1.9 is correct. | | | | |



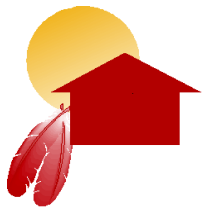
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| III. On-Site Review | | | | |
| A. General | 2 CFR Part 200 | Tribal HUD-VASH Grant Agreement | | |
| 1. Review the sampling methods in the General Instructions and select a sample of files to review. (Sampling may apply at a future date with a full-scale program. At this time, all cases should be reviewed.) | | | | |
| 2. Not all regulations applicable to Tribal HUD-VASH are included in the monitoring plans. For a complete list, review the grant agreement, and the Federal Register Notice. | | | | |
| 3. For the following areas, use the monitoring plans specific to those areas: | | | | |
| a. Procurement and Contract Administration | | | | |
| b. Environmental Review under Part 50 (if applicable) | | | | |



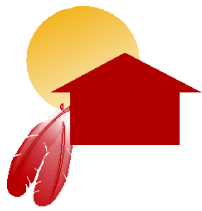
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| B. Tenant Occupancy: | | | | |
| 1. Eligibility and Selection | 24 CFR 1000.10 | Admissions and Occupancy Monitoring Plan | | |
| a. Identify sampling of multiple Tribal HUD-VASH occupancy records. (Sampling may apply at a future date with a full-scale program. At this time, all cases should be reviewed.) | | | | |
| b. Review the identified files for adequacy, accuracy, and completeness. | | | | |
| <p>(1) <u>Low-income Veteran</u>. Using the Tenant Files Review Form or the Occupancy Review Form, determine if the participating Veteran was low income at the time of admission. (Service connected disability payments are excluded from the income calculation.)</p> <p>NOTE: The Tenant Files Review Form is good when the tribe/TDHE's files are program-based and the Occupancy Review Form is good for occupant-based filing systems.</p> | <p><u>Implementation of the Tribal HUD-VA Supporting Housing Program; TECHNICAL CORRECTION</u></p> | <p>Tenant Files Review Form</p> <p>Occupancy Review Form</p> | | |



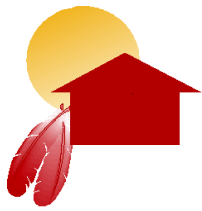
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| (i) Do the files have supporting documentation verifying income? | | | | |
| (ii) Do the files have supporting documentation verifying income prior to providing Tribal HUD-VASH housing assistance? | | | | |
| (iii) Does the tribe/TDHE's Admissions and Occupancy Policy state that the Veteran can continue to participate in the program if he/she subsequently becomes non-low-income? | | | | |
| c. Verify documentation that the participating Veteran is: | | | | |
| (1) Member of a Federally recognized tribe; | | | | |
| (2) Eligible for VA Health Care based on discharge status; | | | | |
| (3) Homeless or at risk of homelessness at the time of admission; and | | | | |



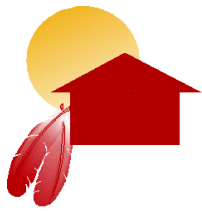
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| (4) Not registered as a lifetime sex offender. (Tier III Offense) | 24 CFR 982.553(a)(2) | | | |
| d. Does the Veteran's file have the following? | | | | |
| (1) Documentation of referral from the VA and referral to appropriate service providers? | | | | |
| (2) Does the file contain: | | | | |
| i. Veteran's First, Middle and Last names? | | | | |
| ii. Veteran's SSN | | | | |
| iii. Veteran's admission to Program date | | | | |
| iv. Unit street address, city, State, zip code and unit number? | | | | |
| v. Building structure type | | | | |
| vi. Number of unit bedrooms | | | | |
| vii. Unit Owner/Agent name, TIN/SSN. | | | | |



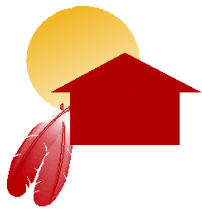
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| viii. Tenant monthly payment contribution | | | | |
| ix. RAP monthly | | | | |
| x. Total due owner monthly | | | | |
| xi. Type of property | | | | |
| xii. Information on each person residing with the Veteran | | | | |
| a. First, Middle and Last name | | | | |
| b. Date of birth | | | | |
| c. Gender | | | | |
| d. Relationship to Veteran | | | | |
| e. Disabled status | | | | |
| f. Race | | | | |
| g. Hispanic/Latino status | | | | |
| h. SSN | | | | |
| i. Veteran ID | | | | |



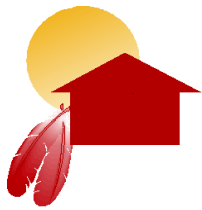
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| <p>(3) Copies of submitted HUD-50058 (revised for Tribal HUD-VASH program).</p> <p>Determine if the Tribe/TDHE is collecting the required information for future reporting.</p> | | | | |
| <p>(4) Rental Assistance Program Contract (only applicable when the landlord is not the grantee)</p> | | | | |
| <p>2. Rental Assistance Program Contract Provisions:</p> | | <p>Rental Assistance Payments (RAP) Contracts Requirements</p> | | |
| <p>a. Veteran's full name and listing of all household members, including live-in aides, if applicable</p> | | | | |
| <p>b. Address of unit, including apartment number, if any</p> | | | | |
| <p>c. Signatures of responsible parties (Tribe/TDHE and unit owner)</p> | | | | |



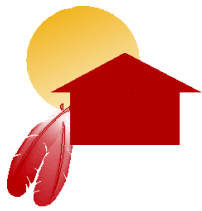
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| d. Contract provisions to include: | | | | |
| (1) Maintaining unit to housing quality standards | | | | |
| (2) Permitting tribe/TDHE to make compliance inspections | | | | |
| (3) Contract rental amount, including payment terms and instructions | | | | |
| i. Contract must begin on the first day of the initial term of the lease and terminate after 12 monthly RAP payments (unless HUD has approved a shorter rental period) | | | | |
| ii. A contract extension provision is acceptable in the event of future appropriations. | | | | |
| iii. Contract must terminate automatically if the lease is terminated. | | | | |



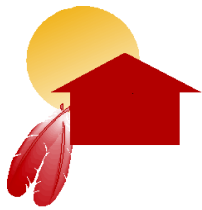
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| iv. Contract may also specify other circumstances for RAP termination | | | | |
| v. Must include a statement that the RAP contract may not be assigned to a new owner without the consent of the Tribe/TDHE | | | | |
| (4) Tribe/TDHE monthly RAP paid must comply with Section VI Tribal HUD-VASH Program Requirements. Tenant's portion cannot exceed 30% of household monthly adjusted income. | | | | |
| (5) Must specify all costs included (i.e. utilities) and appliance(s) provided by the unit owner | | | | |
| 3. Additional provisions for Project-Based Assistance: If funds are used to finance or secure financing for construction or rehab. (tribal or TDHE owned units will document these provisions outside of the RAP). | | | | |



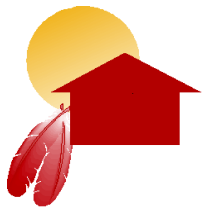
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| a. Occupancy of Unit by Non-Veteran – Provision requiring HUD approval to house low-income non-Veterans if tribe/TDHE no longer has a need to house Veterans. | | | | |
| b. Unoccupied Units – Must include a provision that no Tribal HUD-VASH funds will be paid for a vacant unit. | | | | |
| c. Contract Renewal – provision that a new RAP contract must be executed with additional appropriations. | | | | |
| 2. File Documentation and Certifications NOTE: Recipient must maintain documentation of all referrals and eligibility screening records. | | | | |
| a. Verify that each sampled file contains the following documentation at initial occupancy: | | Record Keeping at Initial Occupancy | | |
| (1) Social Security Number | | | | |



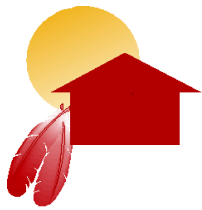
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| (2) If no, SSN, the DD-214 or VA-verified Application for Health Benefits (10-10EZ) | | | | |
| (3) Birth Certificate, or DD-214 or 10-10EZ | | | | |
| (4) VA issued photo ID | | | | |
| (5) No Veteran or household member registered as Lifetime Sex Offender | | | | |
| a. Background checks | | | | |
| b. Verify that income recertification is conducted and documented annually. | | | | |
| c. Determine if interim recertification is conducted when the occupant's income decreases. | | | | |
| 3. Payment and Collection Record | | | | |
| a. Is the rent no more than 30 percent of the Veteran's monthly adjusted income? | | | | |
| b. Are rental payments current? | | | | |



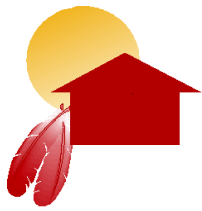
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| c. If rental payments are not current, is the occupant in and adhering to a repayment plan? | | | | |
| 4. Unit Eligibility NOTE: An FCAS unit is NOT eligible for Tribal HUD-VASH funding. | | Implementati on of the Tribal HUD- VA Supporting Housing Program; TECHNICAL CORRECTIO N | | |
| a. Is the Veteran receiving tenant-based rental assistance or project-based rental assistance? | | | | |
| b. For tenant-based or project-based rental assistance: | | | | |
| (1) Did HUD issue a Release of Funds before the unit was approved for leasing? | | | | |
| (2) Is the unit size suitable for the occupant? If the unit is not, does the amount of rental assistance match the appropriate unit size? (Project-based only) | | | | |



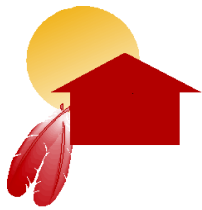
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| (3) Does the unit meet applicable housing codes and quality standards? | NAHASDA Section 207(a)(2) | | | |
| (4) Is the unit on or near the reservation? | | | | |
| (5) If the Veteran has a physical disability, is the unit compliant with Section 504 accessibility requirements? | | Section 504 Accessibility Monitoring Plan | | |
| (6) Is there evidence that a Veteran was unable to locate suitable housing? | | | | |
| C. Policies | | | | |
| 1. Income Calculation: Did the recipient follow existing income eligibility? | | | | |
| 2. Sex Offender: Does the policy prohibit admission if the Veteran or any family member is on the lifetime sex offender registration list? | | | | |
| 3. Tribal Preference: Did the recipient follow existing tribal preference policy or create a new one specific to Tribal HUD-VASH? | | | | |



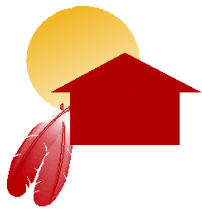
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| D. Reporting – Program Progress | | | | |
| 1. Is the recipient timely in submitting the following? | | | | |
| a. Occupant income, rent, and household composition (HUD-50058) (monthly, quarterly or annually... TBD by HUD) (Determine if the Tribe/TDHE is collecting the required information for future reporting.) | | | | |
| b. Occupant files electronically to HUD? | | | | |
| c. Federal Financial Reports (SF-425) (Separate form filing for Tribal HUD-VASH quarterly) | | | | |
| d. Financial audit | | | | |
| e. IHP/APR (using “Other Federal Funding” or “Other Funding” categories) | | | | |
| d. Is actual progress consistent with that reported? | | | | |



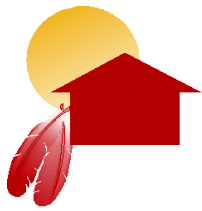
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| D. Other Monitoring Issues | | | | |
| 1. Does the tribe/TDHE have any current or proposed repayment agreements with HUD? | | | | |
| a. If yes, is the tribe/TDHE current in its repayments to HUD? | | | | |
| 2. Is there evidence that the tribe/TDHE did not use the Tribal HUD-VASH funds in accordance with applicable requirements? | | | | |
| 3. Is the recipient accounting for and expending program income correctly? Request and review financial system expenditure reports. | Federal Register - 78 FR 63822, October 21, 2015 | Financial and Fiscal Management Monitoring Plan: Appendix 6 (Program Income) | | |
| a. Compare the expenditure totals to the amounts reported in the latest status report. | | | | |



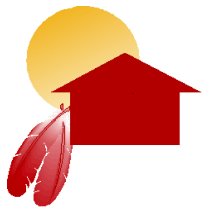
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| <p>b. Planning and Admin costs must be broken out – the program will receive a flat administrative fee of \$1,020 per unit, for a 12-month period. Indirect cost rate can be used if in the plan.</p> | <p>Federal Register - 78 FR 63822, October 21, 2015 Section N: https://www.federalregister.gov/documents/2015/10/21/2015-26748/implementation-of-the-tribal-hud-va-supportive-housing-program</p> | | | |
| <p>c. LOCCS</p> | | | | |
| <p>(1) Budget line items: 1606-Admin Fee; 1640 Rental Assistance Payments (RAP)</p> | | | | |
| <p>(2) Drawn down: RAP – monthly with residents in place; Admin Fee drawn periodically.</p> | | | | |
| <p>(3) LOCCS drawdowns must be equal to Tribal HUD-VASH Rental assistance payments and associated administrative costs. Supporting documentation maintained for all drawdowns.</p> | | | | |



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| d. Select a sample of expenditures and request supporting documentation for those transactions. | | | | |
| 4. Is expending the Tribal HUD-VASH administrative fee only on managing and operating the program? | | | | |
| a. Is any of the Tribal HUD-VASH administrative fee in a reserve account? Reserve accounts are not allowed for this program. | Federal Register -78 FR 63822, October 21, 2015 Section N: https://www.federalregister.gov/documents/2015/10/21/2015-26748/implementation-of-the-tribal-hud-va-supportive-housing-program | | | |
| 5. As part of the Maintenance and Inspection monitoring, include in the sample some Tribal HUD-VASH properties. Note the following: | | | | |
| a. Condition of the property | | | | |
| b. Vacancy status | | | | |



| RECIPIENT NAME: | <u>Regulatory/ Statutory Citation</u> | <u>Other Tools</u> | <u>Ref. Pg.</u> | <u>Remarks</u> |
|---|---|--------------------|---------------------|----------------|
| 6. As part of the Admissions and Occupancy monitoring, include in the sample some renters of Tribal HUD-VASH properties and determine if the occupants were eligible at the time of admission. | | | | |
| 7. If possible, take photographs of Tribal HUD-VASH properties to document condition. | | | | |
| 8. Does the tribe/TDHE have any comments on the Tribal HUD-VASH program? | | | | |
| IV. Summary | | | | |
| 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

Tribal HUD-VASH
Monitoring Plan
RECIPIENT

| | |
|------------------------|--|
| Reviewer Name: | |
| Review Date(s): | |