



AKWESASNE HOUSING AUTHORITY

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Self-Monitoring Compliance Assessment Summary Report Program Year: January 1, 2018 to December 31, 2018

Introduction

The Self-Monitoring Compliance Assessment Summary Report of the Akwesasne Housing Authority's (AHA) Indian Housing Block Grant (IHBG) program was completed on February 6, 2019 covering the program year 2018. This assessment was conducted as required by the Akwesasne Housing Authority's Self-Monitoring Policy adopted by Resolution #2011-44 and in accordance with requirements of the Native American Housing Assistance and Self-determination Act of 1996 (NAHASDA). The Akwesasne Housing Authority's (AHA) Self-Monitoring Policy requires the evaluation of areas specific to the administration of programs and services of the AHA. This is to ensure compliance with applicable Federal requirements and monitoring performance goals described in the AHA's Indian Housing Plan. Specifically, Section 403(b) of NAHASDA states: "Not less frequently than annually, each recipient shall review the activities conducted and housing assisted to assess compliance with requirements of this Act."

The Policy

The AHA Self-Monitoring Policy (adopted 11/16/2011) is in compliance with 24 CFR 1000 Subpart F (Recipient Monitoring Oversight, and Accountability) of NAHASDA.

The AHA conducts an annual self monitoring compliance assessment in allegiance to the new policy and will be fully compliant with federal self-monitoring requirements.

Comprehensive Self-Monitoring

Completion of the following reports shall constitute the AHA's complete self-monitoring requirements for 2018:

1. The Self-Monitoring Compliance Assessment Report – submit to Saint Regis Mohawk Tribe.
2. The Annual Performance Report – submitted to HUD by March 30, 2019
3. The Annual Audit – scheduled to be submitted to HUD within 30 days after receipt of the final auditor's report or nine months after the audit period.

This Self-Monitoring Assessment Summary report is completed annually and kept on file with the Akwesasne Housing Authority and will be available for review by the US Department of Housing & Urban Development.

Approach

The approach used was to conduct an overall housing assessment to ensure objectivity and impartiality with no one reviewing their own work.

Methods

The AHA utilized the one on one interviews with managers and/or program administrators to complete the self-monitoring checklist to gain insight into adherence to specific compliance topic areas.

The Self-Monitoring Checklist was completed; areas of weaknesses were identified and added to the Performance Improvement Plan. This plan will serve as the tool to strengthen performance in the coming year, with target dates identified for each area. This will be on file and available for review.

The Self-Monitoring Compliance Assessment Report approved by the Board of Commissioners will be presented to the Saint Regis Mohawk Tribal Council in order to fulfil the self-monitoring requirements.



The Assessment

Introduction

AHA continues to fulfill its mission in providing safe and sanitary housing to eligible tribal members. The completed “Self-Monitoring Checklist” identified some areas for improvement in 2018. AHA continued embarking in new directions in Indian housing development with a large focus on supportive housing and energy efficiency in tribal homes. Over \$12 million in new ventures and grants were secured, and work continued in the direction of supportive housing implementation.

The following areas of performance were assessed, and the following pages provide a detailed description of these areas monitored for the program year 2018, and their planned remedies, if problems were noted:

- (A) APR Development and IHP Monitoring
- (B) Organizational Control Environment
- (C) Resident Eligibility and Service Standards
- (D) Fiscal and Financial Management
- (E) Procurement and Contract Administration
- (F) Labor Standards and Contract Administration
- (G) Force Account Construction
- (H) Environmental Review Responsibilities

- (I) Tribe Declining Environmental Review Responsibilities
- (J) Audit Reports
- (K) Financial Health Assessment
- (L) Physical Assessment
- (M) Complaints Management
- (N) Other

A. APR Development and IHP Monitoring

In preparation for the 2018 APR, all open grants will be reviewed and combined in the IHP/APR which is now mandatory for online submission through EPIC. Internally the AHA tracks annual allocations to stay within budget, and funds were carried over to the new fiscal/operating year. Generally, the AHA is on track for all grants program-wise and minimal funds remain, all of which are 100% obligated, as evidenced by the AHA's current submission of the HUD Standard Form 425, Federal Financial Report. Most funds were targeted for the new Sunrise Acres III supportive housing construction. The work is scheduled to be completed within the established time frames and in compliance with regulations.

Updating AHA policies and procedures were conducted in late 2018 to be implemented in 2019. AHA will continue to work towards building cooperative agreements with the appropriate local governments and supportive agencies in New York State -Franklin County and St. Lawrence County in 2019.

B. Organizational Control Environment

This section addresses organizational structure, staffing, Board bylaws/meetings, policies, records management, self monitoring, etc. Overall the organization has a firm foundation for conducting its mission, with well established policies and procedures. There is the need to regularly review all policies and address the areas that may need implementing or updating. In 2018, the Board and Managers conducted policy reviews, established and amended policies for enhancement and clarification of procedures and to remain NAHASDA compliant.

Regular reporting to the Board and communication at most levels are maintained through the Executive Director and department managers, when necessary. An increase in financial reporting will include the quarterly financial statement submissions and thorough review with the Board by the CFO. The Board is regularly engaged in all areas of the housing programs by which they receive regular information from each department at monthly board meetings. The Board commissioners stay involved in housing trends by attending training and conferences when needed. Organizational changes have brought about a more clear delineation of job duties and responsibilities within the departments and working more cohesively as a team.

Implementation of the Records & Information Management Policy (RIM) enacted in 2017 and in 2018 AHA undertook a massive endeavor for more efficient file management. All records were catalogued and e-saved, then systematically destroyed. This will be ongoing to manage all types of records. In house training on the RIM policy will continue in 2019.

AHA continues to self-monitor the progress of their programs and services and will continue to work on the areas addressed in the performance improvement plan for 2019.

AHA's internal controls are strong with verified documentation supporting its operational budgets, sub-recipient agreements, and have adequate staffing to complete its departmental responsibilities.

The AHA developed and adopted a written grievance policy for participants of the programs and services in December 2017. Internal training on the Grievance Policy procedures was incorporated in 2018 and continues in 2019 for staff and the Board of Commissioners.

Construction complaints will continue to be managed through the AHA's work order process during its warranty period, and any complaints after warranty will be handled on a case-by-case basis. The issue may go through the Grievance Policy process to the Board level and the Board determines the steps to be taken within our policies. The Grievance Policy will be implemented in 2019 with the necessary staff training.

C. Resident Eligibility and Service Standards

This section addresses eligibility and services. The AHA manages the NAHASDA Homeownership Program, the Tenant Assistance Program, the Sunrise Acres Elderly Program, along with the Resident Opportunities and Self Sufficiency (ROSS).

The AHA provides adequate insurance coverage for its units under management, up to date income guidelines are utilized, and payments are based on move-in certifications and re-certifications. The AHA's collection process is adequately documented and procedures are followed accordingly.

Ensuring the eligibility, admissions, and occupancy policies are readily available to the public, steps will be taken to ensure the policy binder is updated periodically and located in the front lobby of the AHA administrative offices. Overall the checklist for this section addressed no major issues. Additional training in admissions and occupancy was provided for housing services staff in 2018 and will continue in 2019 through on and off site training.

D. Fiscal & Financial Management

Reporting requirements in the area of finance are well established and adhered to by the AHA. Financial reports, audits, investments, LOCCS draw records, bank statements are adequately managed in accordance with the Finance, Investment, and Cash Management policies of the AHA. Audits are a major focus of the AHA, and the records for the annual audit are presented with great attention to precision and detail to prepare a smooth audit.

The auditing company, Crowley & Halloran, CPA, have conducted the AHA's annual audit for the fiscal years 2013 through 2017 audit.

The AHA's fiscal responsibilities branch out to the various departments, and all managers respond to regular planning meetings and submit timely budget requests. Their annual expense budgets are submitted and the CFO puts together department budgets according to awarded

federal funds. As federal funds begin to see cutbacks, the AHA's challenges in future years will be to find ways to reduce spending and increase revenue.

AHA's acquisition of two large parcels of tribal property, with work on one property to focus on supportive housing for seniors with special needs and homeless veterans which broke ground in summer, 2018, the other off-site for low-income families. AHA along with a Master Planning Team from Sustainable Native Communities Collaborative have begun the future planning development process working collaboratively with SRMT departments and with community input in 2017 and 2018 with the final plan presented on December, 2018.

It will be necessary to strengthen all departments in their specific areas of expertise in supportive housing, and continue to provide training in this area for 2019.

E. Procurement and Contract Administration

The standards of procurement and contract administration have been maintained including keeping bid log records, managing various duties relating to information management, ensuring contractors have adequate insurance coverage, filing properly executed payment requests, and letting out accurate contracts to responsive and responsible bidders.

AHA enhanced the roles of the department managers by providing comprehensive training in procurement practices. With the upcoming projects with mixed funding, AHA will ensure that the role and responsibilities for procurement are administered by a staff member in 2019.

F. Labor Standards and Contract Management

A review of the development and construction contract files was conducted to determine compliance with NAHASDA requirements related to labor standards. Overall, the records were organized in a manner that was sufficient to meet program requirements.

For NAHASDA projects, Davis Bacon wage rates are not required due to the Saint Regis Mohawk Tribe adopting its own prevailing wage rates and such are reviewed and revised on an annual basis. AHA adheres to overtime provisions and in general is in compliance with HUD Handbook 1344.1. Wage rates are reported and included in applicable contract documents, and payroll reviews are conducted on a regular basis.

G. Force Account Construction

The AHA has practiced force account construction since 1999 and built the better part of its NAHASDA housing stock with this method. This practice led to tighter controls over construction quality and lower overall costs.

There are controls and software that track the financial aspects of all Force Account activities, and policies in place to protect the AHA's work, such as business liability insurance and policies related to workplace safety.

With the completion and renovation of Sunrise Acres elderly units, the AHA utilized its force account construction crew to work on energy efficiency upgrades for Sunrise Acres and homebuyers in 2018.

H. Tribes Assuming Environmental Review Responsibilities

The AHA keeps a solid system of environmental review filing, maintaining Environmental Review Records (ERRs) for each eligible housing activity by Fiscal Year, and processes its requests for environmental clearance to the Department of Housing & Urban Development (or other funding sources) in a consistent manner. There is a Master Environmental File (MEF) that holds the most current information on all applicable laws and authorities related to environmental review preparation. These MEFs are updated by the AHA on a periodic basis whenever laws and authorities are updated, changed, and would affect the activities of the Authority.

Individual ERRs maintain documentation pertinent to the activity, proof of the basis for the activity and the required ERR Guides that are recommended by HUD. In addition, the AHA also conforms to tribal environmental review requirements and fulfills the recommended guidelines set out by the Saint Regis Mohawk Tribe Environmental Division, the tribally-sanctioned entity that carries out all matters relating to environment for the tribe, and as authorized by NEPA (National Environmental Protection Agency). This may be considered double duty on the part of the AHA, but this method is thorough and covers all pertaining to the environment, both locally and nationally.

Within each file, a “memo to ERR” is done prior to the HUD release of funds (when applicable). This establishes the date of finding and signature of the Certifying Officer, which is a Tribal Chief for the Saint Regis Mohawk Tribe.

This review confirms that the AHA routinely conducts environmental reviews in accordance with 24 CFR Part 58.

I. Tribes Declining Environmental Review

(N/A)

J. Audit Reports

Audit regulations as per OMB Circular A-133 require that an annual audit takes place and is submitted in its final form to the Federal Single Audit Clearinghouse, to the Tribe, and to HUD by specified deadlines. The AHA has complied with this requirement since the beginning (1984) and continues to adhere to standards set out by NAHASDA regulation (24 CFR 1000).

In July, 2016 HUD conducted its on-site monitoring review of the Indian Housing Block Grant program. The purpose of this review is to fulfill HUD’s statutory obligation to review compliance with HUD and related requirements. AHA received no findings and one concern. AHA’s response will state that, due to budgetary concerns from many home conveyances and depleting IHBG funds, procurements will be handled in the Finance Department. AHA will

provide additional training for all staff. The AHA received its final Monitoring Report on January 27, 2017, which noted that their recommendation was satisfactorily addressed and closed.

The results of the AHA's 2017 audit was clear of findings, and at the publishing date of this report, AHA is prepared to conduct its 2018 annual audit on February 19-22. Results of the 2018 audit will be forthcoming.

K. Financial Health Assessment

The AHA conducts a "Financial Health Assessment", as referenced in the Compliance Assessment Checklist (AHA Self Monitoring Policy, 11/2011). This is not a regulatory requirement but a "good business practice", which will assess the overall financial health of the AHA. Improving on any of these factors will ensure its overall success.

The six indicators are:

- 1) Timely use of funds – a basic indicator which shows whether the recipient is obligating and expending NAHASDA grants without long delays.
- 2) Current Ratio – measures the liquidity of the organization and its ability to cover current liabilities.
- 3) Tenant Receivables Outstanding – shows the average number of days it takes the organization to collect payments from tenants and the amount of receivables.
- 4) Occupancy Loss – shows whether the organization is making the most of its units through high occupancy.
- 5) Management Expense Per Unit – shows how much overhead expense the organization incurs in the delivery of housing.
- 6) Net Operating Income – reflects the relationship between operating expenses and operating income – what's left over.

The AHA conducts this financial health assessment on an annual basis, after the annual audit.

L. Physical Assessment

Regular maintenance inspections in the area of Part B appropriate follow up was addressed in 2018. The Homebuyer Maintenance Policy and Sunrise Acres Maintenance Policy were adopted in April 2012. AHA staff is thoroughly trained in carrying out needed inspections, including having proper formats for these inspections that list all safety and health items to watch for. The process in carrying out these exist with the appropriate Development personnel, with administrative support in keeping track of scheduling and follow-up appointments. These are maintained on a regular basis and as long as the tenant complies with the scheduled appointment, reports are filed in the tenant's file.

Follow-up on inspections was noted as a concern and was addressed through additional training in inspection procedures and collaborative meetings for appropriate staff in 2018; this will continue in 2019 as well as holding maintenance workshops for homebuyers.

M. Complaints Management

The AHA manages an internal system of complaints processing with use of HDS software.

The AHA prepares and sends out periodic notices, letters and new policy updates, and publishes its IHP and APR on its website. The AHA conducts an Annual Board Meeting for the community to present the programs and new initiatives. This meeting is held in July.

Overall complaints are managed on a case-by-case basis, with very few issues going to the Board for resolution. In most cases, however, the Board of Commissioners attempts to offer solutions or assistance to come to an amicable resolution. The AHA developed and adopted a written grievance policy for participants of the programs and services in December 2017. Internal training on the Grievance Policy procedures will be incorporated in 2019 for staff and Board commissioners.

The AHA staff received local training in the area of customer service for listening and responding to complaints in 2016 with training update resources materials in 2017 and 2018. A customer service training for all staff will be held in 2019.

Keeping tenants and homebuyers informed through newsletters and community meetings will be conducted in 2019.

N. Other

This area addresses building codes, maintenance standards, design and development, management of proceeds of sale, and other general business practices that do not require improvement.

The AHA hosts an annual public meeting of the Board of Commissioners where presentations are made in areas of programs, services and future planning. The AHA acknowledges the need to periodically hold informational sessions to present the products and services AHA provides. The annual Board meeting for the community was held in July 19, 2018.

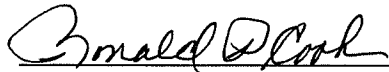
Conclusion

The Akwesasne Housing Authority maintains good progress towards serving its tribal members with housing opportunities. The practice of identifying areas of weakness is just one step in improving progress in its overall mission. This report summarizes those areas with recommendations and a plan to improve in the coming year. Along with the AHA's Annual Performance Report (2018) and Annual Audit (2018), this summary shall complete requirements pertaining to 24 CFR 1000.502 and NAHASDA Section 403(b).

The Self-Monitoring Assessment Summary, Self-Monitoring Checklist, and the Performance Improvement Plan for the upcoming year are on file at the administration offices of the AHA, and are available for agency review upon request. The AHA is encouraged by the support of its Board in all its endeavors and hopes to have much growth, both in services and programs to the community of Akwesasne (Saint Regis Mohawk Tribe) and success in continuing self-determination through its economic ventures in the future.

Board of Commissioners Certification of Approval

This Self-Monitoring Compliance Assessment Summary Report for FY 2018 is hereby approved by Board vote at a duly called meeting of the AHA Board of Commissioners.



Ronald Cook, Chairman



Diane Boots, Secretary

February 14, 2019

Date

February 14, 2019

Date

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