



NAHASDA GUIDANCE

National Office of Native American Programs

ONAPs

No. No. 2001-05
January 26, 2001

TO: All ONAPs

/s/

FROM: Jacqueline Johnson, Deputy Assistant Secretary, P

TOPIC: Grants Evaluation Guidebook

SUBJECT: Revisions to Grants Evaluation Guidebook

Attached are “Annual Performance Review Guidelines” and “APR Reviewer Questions” as revisions to the Grants Evaluation Guidebook. The attachments should be filed as an appendix to Chapter 1 immediately after the Tool 5: APR review comments letter.

ATTACHMENTS

ANNUAL PERFORMANCE REPORT REVIEW GUIDELINES

Purpose: The purpose of this document is to provide recommended detailed steps for conducting the review of the Annual Performance Report (APR).

Background: Recipients are required by section 403(b) of Native American Housing Assistance and Self-Determination Act (NAHASDA) to review the activities conducted and the housing assisted under the Act at least once each year to assess their compliance with the NAHASDA requirements. In addition, section 404 of NAHASDA requires that each fiscal year recipients review progress they have made in carrying out the activities described in their Indian Housing Plans (IHPs). The results and conclusions of these reviews shall be included in the performance report also required by section 404. After making the report publicly available to the citizens in its jurisdiction, and in the case of a tribally designated housing entity the report will also be made available to the tribe, recipients submit the conclusions to HUD.

Scope: NAHASDA Guidance number 1999-01 (ONAP), Review of the Annual Performance Report (November 10, 1998) and Chapter 1, APR Review Process Guidelines of the Grants Evaluation Guidebook (December 1999) provide the steps for processing an APR. The NAHASDA Guidance indicates that detailed steps for conducting a review of the APR would be provided at a future date; it is the intent of this document to meet this commitment.

The requirements for review of the APR are not as stringent as those for review of the IHP. Unlike that review, the purpose of the APR review is not to establish recipient compliance with statutory requirements. The APR describes the recipient's progress in accomplishing the goals and objectives that are stated in their IHP. It also provides information to HUD regarding a recipient's assessment or evaluation of its compliance with NAHASDA requirements.

Reviewers responsibilities include:

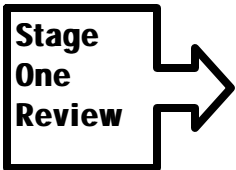
- determining if the report was submitted in a timely manner as required by 24 CFR 1000.514;
- determining if it included all required information;
- providing recommendations on the recipient's plans and on the APR to assist the recipient in improving affordable housing delivery; and,
- providing comments to the recipient regarding its IHBG performance based on their review of information in the report.

The APR reviewer has the flexibility to determine which steps of the review guidelines must be completed to support the reviewer's conclusions and recommendations.

Interface with Annual Assessments: The APR and any observations and comments of the reviewer made during the APR review serve as the foundation for the annual assessment of

recipient performance. While the Grants Evaluation Business Process does not require concurrent reviews, it is recommended that the annual assessment be accomplished immediately upon completion of the APR review. When completed concurrently, the APR review and the annual assessment should be completed within 60 days of receipt of the APR.

Review Guidelines: The Review Guidelines are divided into two stages, with slightly different objectives. The first stage is to determine if the APR is complete and accurate. The second stage is a detailed evaluation of the APR (1) to determine if the recipient is progressing towards meeting its affordable housing goals and (2) to develop constructive suggestions to the recipient to improve its operations, IHP and delivery of its affordable housing services.



I. Determine if APR is complete and accurate.

1. Read APR for completeness and accuracy.
2. Compare available fund amounts in Table I – Sources of Funds to grant award documentation for IHBG and any other HUD grants.
3. Compare expenditure amounts to budgeted amounts of Table II – Uses of Funds.
4. Compare expenditure amounts of Table II –Uses of Funds to the narrative sections of APR for internal consistency.
5. Determine if the APR is sufficiently complete to acknowledge receipt of the report and indicate it has been accepted for review. If the APR is insufficiently complete, the APR should be **rejected**.
6. Verify mathematical accuracy of Table I – Sources of Funds, Table II – Uses of Funds, and Table III – Inspection of Assisted Housing.
7. Review responses to ensure that appropriate questions have been answered and that answers are complete and reasonable. If the recipient indicates this is the final APR for a grant, a copy of the APR must be forwarded to the Grants Management Director to complete the close-out procedures identified in NAHASDA Guidance 2000-09 (ONAP) once the review of the APR is complete.
8. Determine if the essential components of the APR have been submitted. The **essential components** of the APR are: Part I detailing progress on the goals, objectives and performance objectives of each open grant; Tables I, II and III; and Part II Section A-Monitoring.



9. Continue to Stage Two, if the essential components are complete and accurate. If the recipient does not submit the essential components within the review period, the APR would be **rejected**.

II. Read and compare APR to IHP

A. Part I – Reporting on the One-Year Indian Housing Plan



1. For each open grant compare the Goals, Objectives and Performance Objectives with the most recent version of the IHP's One Year Plan:
 - a. Notate any differences between APR and IHP.
 - b. Determine if the differences indicate an amended IHP should be submitted. Title 24 CFR 1000.232 requires HUD review if the recipient is adding a new activity or decreasing funding to protect and maintain 1937 Housing Act assisted units.
 - c. If a determination is made that an amended IHP should be submitted, confer with the Grants Management Director and appropriate specialist. Notify the recipient in the review letter and provide any comments that could be useful to the recipient in the implementation of its IHP or in the preparation of future housing plans and performance reports.
2. Review responses to questions 2 and 3 of Part I:
 - a. If recipient is behind schedule to complete the 5-year goals and objectives, are the plans to modify its program reasonable and attainable?
 - b. Determine if the modifications require an amended IHP. (Refer to 24 CFR 1000.232)
 - c. If an amended IHP should be submitted, confer with Grants Management Director and the appropriate specialist and notify the recipient in the review letter.
3. Review Table I – Sources of Funds and Table II - Uses of Funds for each open grant:
 - a. Notate any differences between APR and IHP.
 - b. Determine if the differences require an amended IHP.
 - c. If amended IHP should be submitted, confer with the Grants Management Director and the appropriate specialist and notify the recipient in the review letter.
 - d. Compare expenditure amounts to LOCCS disbursements.
 - e. Compare expenditure amounts to audit report for the period provided the report has been issued and received.
 - f. Compare expenditure amounts to monitoring reports.
 - g. Compare financial tables to financial tables in prior APRs.
 - h. Compare reported investment information to ONAP investment approval file for consistency with HUD approvals.

- i. Compare amount of funds available (Table I) to the expenditure amount (Table II) for reasonableness. For example, did the recipient report expending more funds than available.
- j. Determine if amounts reported are reasonable based on information from narrative sections of APR, audit reports, monitoring reports, prior APRs, LOCCS disbursements, complaints, investment approval, self-monitoring and tribal monitoring review results, comments from public and tribe and reviewers past experience with recipient.
- k. Provide any comments based on review that could be useful to the recipient in the implementation of its IHP or in the preparation of future performance reports.

B. Part II – Reporting on Program Year Accomplishments

4. Review Section A – Monitoring

- a. Review responses to ensure that appropriate questions have been answered and that answers are complete and reasonable.
- b. Provide any comments based on review that could be useful to the recipient in the implementation of its IHP or in the preparation of future performance reports.

5. Review Table III – Inspection of Assisted Housing:

- a. Compare total number of 1937 Housing Act funded units to the Formula Current Assisted Housing Stock listing. The Current Assisted Housing unit count for Mutual Help units should decrease over time as the units are paid off and conveyed to the homebuyer. If the unit count has not changed for older Mutual Help projects, this may indicate the recipient is not reporting conveyances properly and timely.
- b. Review narrative responses to ensure that appropriate questions have been answered and that answers are reasonable.
- c. Compare inspection policy information to IHP.
- d. Compare inspection information to narrative sections of the APR for internal consistency.
- e. Determine if housing inspection data is reasonable based on information from narrative sections of APR, audit reports, monitoring reports, prior APRs, complaints, comments from public and tribe, self-monitoring and tribal monitoring review results and reviewers past experience with recipient.
- f. Provide any comments based on review that could be useful to the recipient in the implementation of its IHP or in the preparation of future performance reports.

6. Review Section B – Audits:

- a. Compare to audit file.
- b. Compare to narrative sections of the APR for internal consistency.

- c. Determine if an audit is due based upon financial table information.
- d. Determine if audit information is reasonable based on information from narrative sections of APR, Financial Table II, monitoring reports, complaints, comments from public and tribe, self-monitoring and tribal monitoring review results and reviewers past experience with recipient.
- e. Provide any comments based on review that could be useful to the recipient in the implementation of its IHP or in the preparation of future performance reports.

7. Review Section C – Public Accountability:

- a. Compare to narrative sections of the APR for internal consistency.
- b. Compare to accountability information of previous APRs.
- c. Determine if accountability information is reasonable based on information from narrative sections of APR, monitoring reports, complaints, self-monitoring and tribal monitoring review results, prior APRs and reviewers past experience with recipient.
- d. Provide any comments based on review that could be useful to the recipient in the implementation of its IHP or in the preparation of future performance reports.

8. Review Section D – Jobs Created by NAHASDA:

Determine if the number of positions is reasonable based on information from narrative sections of APR, monitoring reports, complaints, self-monitoring and tribal monitoring review results, prior APRs and reviewers past experience with recipient.

C. Overall Assessment of Annual Performance Report



9. Review the recipient's reported progress:
- a. Determine if the recipient has received ONAP approval for Requests for Release of Funds for any /all applicable projects.
 - b. Notate any occurrences of work beginning before meeting the environmental review requirements.
 - c. Compare reported progress with recent monitoring reports both on- and off-site.
 - d. Does amount of progress reported match available funds from Table I, amount of funds drawn from LOCCS, and expenditure amounts from Table II?
 - e. Does amount of progress reported match information in the audit report for the period?
 - f. Compare to progress reported in prior APRs.
 - g. Determine if reported progress is reasonable given information from narration, financial tables, audit reports, monitoring reports, prior APRs, LOCCS disbursements, recent complaints, self-monitoring and tribal monitoring review results, comments from public and tribe, and reviewers past experience with recipient.

- h. Provide any comments based on review that could be useful to the recipient in the implementation of its IHP or in the preparation of future performance reports.
- i. Determine if recipient is fulfilling the responsibility to maintain the 1937 Housing Act units by comparing the amount expended for operating and modernization of housing units to assisted housing inspection for the current and previous APRs. If the recipient is maintaining the 1937 Housing Act units the number of units needing rehabilitation will fluctuate up and down as the recipient rehabilitates units and conducts subsequent unit inspections.

APR Reviewer Questions

Purpose: The purpose of this document is to convey the reviewer questions that are part of the automated APR system.

- 1) Based on cursory review is APR: Complete Incomplete
- 2) Recipient has been notified of APR status? Yes No
- 3) Where applicable, TDHE has submitted APR(s) to tribe(s)? Yes No N/A

PART I - Goals and Objectives

- Question Status: 1. Are all goals and objectives the same as those listed in the IHP?
- Question Status: 2. Have the performance objectives been listed as they were listed in the IHP?
- Question Status: 3a. Where applicable, has recipient given a reasonable explanation as to why goals and objectives have not been met?
- Question Status: 3b. Where applicable, has a revised IHP been submitted?
- Question Status: 3c. If not, is a revision of the IHP indicated?

PART I - Accomplishments

- Question Status: 4a. Have accomplishments been listed where applicable?
- Question Status: 4b. Do the accomplishments seem reasonable based on available information?

PART I - Programs

- Question Status: 5a. Has the recipient provided an explanation as to how it would change its programs?
- Question Status: 5b. Is the explanation reasonable based on available information?

PART I - Table I Sources of Funds

- Question Status: 6a. Is the Planned Amount data (Column b) the same as that listed in the IHP?
- Question Status: 6b. Are there any changes?
- Question Status: 6c. Were the changes the explained?
- Question Status: 7a. Are grant amounts (Column c) listed in all appropriate categories?
- Question Status: 7b. Is the data reasonable based on available information?

PART I - Table II Uses of Funds

- Question Status: 8. Is the Budgeted Amount (Column b) and the Number of Units Planned data (Column g) the same as the data listed in the most recent IHP?
- Question Status: 9. Are the actual amounts reasonable based on available information?

NAHASDA GUIDANCE 01-05 onap

- Question Status: 10. Is the percentage of IHBG funds obligated given, and is it reasonable when compared with other available information ?
- Question Status: 11a. Where applicable, has an analysis and explanation of cost overruns or high unit costs been provided?
- Question Status: 11b. Is it reasonable based on available information?
- Question Status: 12a. Is the recipient approved for investments?
- Question Status: 12b. Has the recipient included investment information?
- Question Status: 12c. Is the investment information reasonable based on available information?

PART II - Section A-Monitoring

- Question Status: 1a. Has a description of the activities undertaken by the recipient to self-monitoring been included?
- Question Status: 1b. Is it reasonable based on available information?
- Question Status: 2. Is a description of the tribe's efforts to monitor the TDHE's implementation of NAHASDA included?
- Question Status: 3a. Has the recipient included any corrective actions it plans to take based on its self-monitoring activities?
- Question Status: 3b. Has the recipient included any corrective actions it plans to take based on the tribe's monitoring activities.
- Question Status: 4. Where applicable, has a description of the recipient's monitoring activities of a sub-recipient been included?

PART II - Table III-Inspection of Assisted Housing

- Question Status: 5a. Is the table complete?
- Question Status: 5b. Is the data listed in Column b consistent with the data in the most recent IHP and the Formula Current Assisted Stock listing?
- Question Status: 5c. Is the data provided in Columns c- g reasonable based on available information?
- Question Status: 6a. If applicable, did the recipient describe why all units were not inspected?
- Question Status: 6b. Is that reasonable based on the recipient's inspection policy and other available information?

PART II - Section B-Audits

- Question Status: 7a. Where applicable, has the audit for the most recent reporting period been submitted with the APR?
- Question Status: 7b. If not, has the recipient indicated when it will be submitted?

PART II - Section C-Public Accountability

- Question Status: 8a. Was the APR made available to the citizens in the recipient's jurisdiction before being submitted to HUD?

NAHASDA GUIDANCE 01-05 onap

- Question Status: 8b. Were comments received from citizens included?
- Question Status: 8c. If not, has an explanation been given as to why not?
- Question Status: 8d. Is the explanation reasonable based on available information?
- Question Status: 9a. Did the TDHE submit the APR to the tribe?
- Question Status: 9b. Were comments received from tribe included?
- Question Status: 9c. If not, has an explanation been given as to why not?
- Question Status: 9d. Is the explanation reasonable based on available information?