



# Coquille Indian Housing Authority

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2678 Mexeye Loop • Coos Bay, OR 97420



# Annual Performance Report

for the fiscal year ended

**SEPTEMBER 30, 2018**

*Public Review Draft*

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*First Impressions Marketing*  
*A Coquille tribal member owned business*

*Alison Wasson*

PHOTOGRAPHY

[www.alisonwassonphoto.com](http://www.alisonwassonphoto.com)

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## INDIAN HOUSING PLAN/ANNUAL PERFORMANCE REPORT (NAHASDA §§ 102(b)(1)(A) and 404(a)(2))

This form meets the requirements for an Indian Housing Plan (IHP) and Annual Performance Report (APR) required by the United States Department of Housing and Urban Development. In addition to these requirements, a tribe or tribally designated housing entity (TDHE) may elect to prepare a more comprehensive IHP. If a tribe or TDHE elects to prepare a more comprehensive IHP, the required elements of this IHP must still be submitted on the prescribed HUD form. The information requested does not lend itself to confidentiality.

Regulatory and statutory citations are provided throughout this form as applicable. Recipients are encouraged to review these citations when completing the IHP and APR sections of the form.

Under the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA) (25 U.S.C. 4101 et seq.), HUD will provide grants, loan guarantees, and technical assistance to Indian tribes and Alaska Native villages for the development and operation of low income housing in Indian areas. Grants will be made to eligible recipients under the Indian Housing Block Grant (IHBG) program. To be eligible for the grants, recipients must submit an IHP that meets the requirements of the Act. The recipient is required to submit the IHP to HUD at least 75 days prior to the start of its 12-month program year (NAHASDA § 102(a)(1)). The APR is due no later than 90 days after the end of the recipient's program year (24 CFR § 1000.514).

The IHP and the APR (previously two separate forms) are now combined into one form. The sections pertaining to the IHP are submitted **before** the beginning of the 12-month program year, leaving the APR (shaded) sections blank. If the IHP has been updated or amended, use the most recent version when preparing the APR. After the 12-month program year, enter the results from the 12-month program year in the shaded sections of the form to complete the APR. More details on how to complete the IHP and APR sections of the form can be found in the body of this form. In addition, a separate IHP and APR report form guidance is available.

Public reporting burden for the collection of information is estimated to average 62 hours, 25 hours for the IHP and 37 hours for the APR. This includes the time for collecting, reviewing, and reporting the data. The IHP data is used to verify that planned activities are eligible, expenditures are reasonable, and recipient certifies compliance with related requirements. The APR data is used to audit the program accurately and monitor recipient progress in completing approved activities, including reported expenditures, outputs, and outcomes. This agency may not collect this information, and you are not required to complete this form unless it displays a currently valid OMB control number.

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**SECTION 1: COVER PAGE**

- (1) **Grant Number:** 55IH4102770
- (2) **Recipient Program Year:** 10/01/2017 – 09/30/2018
- (3) **Federal Fiscal Year:** 10/01/2017 – 09/30/2018
- (4)  **Initial Plan** (Complete this Section then proceed to Section 2)
- (5)  **Amended Plan** (Complete this Section, Section 8 if applicable, and Section 16)
- (6)  **Annual Performance Report** (Complete items 27-30 and proceed to Section 3)
- (7)  **Tribe**
- (8)  **TDHE**

(9) <b>Name of Recipient:</b> Coquille Indian Housing Authority		
(10) <b>Contact Person:</b> Anne F. Cook, Executive Director		
(11) <b>Telephone Number with Area Code:</b> (541) 888-6501		
(12) <b>Mailing Address:</b> 2678 Mexeye Loop		
(13) <b>City:</b> Coos Bay	(14) <b>State:</b> OR	(15) <b>Zip Code:</b> 97420
(16) <b>Fax Number with Area Code (if available):</b> (541) 888-8266		
(17) <b>Email Address (if available):</b> annecook@coquilleiha.org		
(18) <b>If TDHE, List Tribes Below:</b> Coquille Indian Tribe 3050 Tremont Street North Bend, OR 97459  Telephone number: (541) 756-0904 Fax number: (541) 756-0847		

<b>(19) Tax Identification Number:</b> 93-1133051
<b>(20) DUNS Number:</b> 944212935
<b>(21) CCR/SAM Expiration Date:</b> 07/31/2019
<b>(22) IHBG Fiscal Year Formula Amount:</b> \$1,074,776
<b>(23) Name of Authorized IHP Submitter:</b> Anne F. Cook
<b>(24) Title of Authorized IHP Submitter:</b> Executive Director
<b>(25) Signature of Authorized IHP Submitter:</b> <i>Anne F. Cook</i>
<b>(26) IHP Submission Date:</b> 07/14/2017
<b>(27) Name of Authorized APR Submitter:</b> Anne F. Cook
<b>(28) Title of Authorized APR Submitter:</b> Executive Director
<b>(29) Signature of Authorized APR Submitter:</b>
<b>(30) APR Submission Date:</b>

**Certification:** The information contained in this document is accurate and reflects the activities actually planned or accomplished during the program year. Activities planned and accomplished are eligible under applicable statutes and regulations.

**Warning:** If you knowingly make a false statement on this form, you may be subject to civil or criminal penalties under Section 1001 of Title 18 of the United States Code. In addition, any person who knowingly and materially violates any required disclosure of information, including intentional disclosure, is subject to a civil money penalty not to exceed \$10,000 for each violation.



- (3) Planned Program Benefits** *(Describe below how your planned programs and activities will address the needs of low income families identified above. Also describe how your planned programs will meet the needs for the various types of housing assistance. NAHASDA § 102(b)(2)(B):*

CIHA owns and operates 63 affordable housing units on Coquille Tribal Lands including 48 rentals, 1 emergency housing unit, and 14 homebuyer units. Low Rent program participants are transitioned to the Home Grant and Occupancy (HomeGO) homebuyer program as they become qualified. In addition, the Monthly Housing Assistance Program (MHAP) offers 60 tenant-based rental assistance slots to low income Native American and Alaska Native households within the Tribe's five-county service area and Coquille households nationwide.

Awareness and utilization of the Section 184 Indian Housing Loan Guarantee Program is promoted regularly at Tribal events. Application to the program is facilitated for qualified low income Coquille and other Native American and Alaska Native families within the Tribe's five-county service area, as well as access to Individual Development Accounts, homebuyer education, credit counseling, and other services.

- (4) Geographic Distribution** *(Describe below how the assistance will be distributed throughout the geographic area and how this geographic distribution is consistent with the needs of low income families. NAHASDA § 102(b)(2)(B)(i):*

CIHA provides services within the Coquille Indian Tribe's five-county service area which includes Coos, Curry, Douglas, Jackson, and Lane Counties. The distribution of assistance fluctuates but generally mirrors the distribution of the Tribal population within the service area. The majority of CIHA's services are concentrated on Coquille Tribal Lands in Coos County.



**SECTION 3: PROGRAM DESCRIPTIONS**

**Planning and Reporting Program Year Activities**

For the IHP, the purpose of this section is to describe each program that will be operating during the 12-month program year. Each program must include the eligible activity, its planned outputs, intended outcome, who will be assisted, and types and levels of assistance. Each of the eligible activities has a specific, measurable output. The first column in the table below lists all eligible activities, the second column identifies the output measure for each eligible activity, and the third column identifies when to consider an output as completed for each eligible activity. Copy and paste text boxes 1.1 through 1.10 as often as needed so that all of your planned programs are included. For the APR, the purpose of this section is to describe your accomplishments, actual outputs, actual outcomes, and any reasons for delays.

**Eligible Activity May Include** *(citations below all reference sections in NAHASDA):*

<b>Eligible Activity</b>	<b>Output Measure</b>	<b>Output Completion</b>
(1) Modernization of 1937 Act Housing [202(1)]	Units	All work completed and unit passed final inspection
(2) Operation of 1937 Act Housing [202(1)]	Units	Number of units in inventory at Program Year End (PYE)
(3) Acquisition of Rental Housing [202(2)]	Units	When recipient takes title to the unit
(4) Construction of Rental Housing [202(2)]	Units	All work completed and unit passed final inspection
(5) Rehabilitation of Rental Housing [202(2)]	Units	All work completed and unit passed final inspection
(6) Acquisition of Land for Rental Housing Development [202(2)]	Acres	When recipient takes title to the land
(7) Development of Emergency Shelters [202(2)]	Households	Number of households served at any one time, based on capacity of the shelter
(8) Conversion of Other Structures to Affordable Housing [202(2)]	Units	All work completed and unit passed final inspection
(9) Other Rental Housing Development [202(2)]	Units	All work completed and unit passed final inspection
(10) Acquisition of Land for Homebuyer Unit Development [202(2)]	Acres	When recipient takes title to the land
(11) New Construction of Homebuyer Units [202(2)]	Units	All work completed and unit passed final inspection
(12) Acquisition of Homebuyer Units [202(2)]	Units	When recipient takes title to the unit
(13) Down Payment/Closing Cost Assistance [202(2)]	Units	When binding commitment signed
(14) Lending Subsidies for Homebuyers (Loan) [202(2)]	Units	When binding commitment signed
(15) Other Homebuyer Assistance Activities [202(2)]	Units	When binding commitment signed

**Indian Housing Block Grant (IHBG)**

**U.S. Department of Housing  
and Urban Development**

OMB Approval Number 2577-0218  
(exp. 03/31/16)

**IHP/APR**

Office of Public and Indian Housing  
Office of Native American Programs

(16) Rehabilitation Assistance to Existing Homeowners [202(2)]	Units	All work completed and unit passed final inspection
(17) Tenant Based Rental Assistance [202(3)]	Households	Count each household once per year
(18) Other Housing Services [202(3)]	Households	Count each household once per year
(19) Housing Management Services [202(4)]	Households	Count each household once per year
(20) Operation and Maintenance of NAHASDA-Assisted Units [202(4)]	Units	Number of units in inventory at PYE
(21) Crime Prevention and Safety [202(5)]	Dollars	Dollars spent (report in Uses of Funding Table only)
(22) Model Activities [202(6)]	Dollars	Dollars spent (report in Uses of Funding Table only)
(23) Self-Determination Program [231-235]		
Acquisition	Units	When recipient takes title to the unit
Construction	Units	All work completed and unit passed final inspection
Rehabilitation	Units	All work completed and unit passed final inspection
Infrastructure	Dollars	Dollars spent (report in Uses of Funding Table only)
(24) Infrastructure to Support Housing [202(2)]	Dollars	Dollars spent (report in Uses of Funding Table only)
(25) Reserve Accounts [202(9)]	N/A	N/A

**Outcome May Include:**

(1) Reduce over-crowding	(7) Create new affordable rental units
(2) Assist renters to become homeowners	(8) Assist affordable housing for college students
(3) Improve quality of substandard units	(9) Provide accessibility for disabled/elderly persons
(4) Improve quality of existing infrastructure	(10) Improve energy efficiency
(5) Address homelessness	(11) Reduction in crime reports
(6) Assist affordable housing for low income households	(12) Other – must provide description in boxes 1.4 (IHP) and 1.5 (APR)

**IHP: PLANNED PROGRAM YEAR ACTIVITIES (NAHASDA § 102(b)(2)(A))**

For each planned activity, complete all the non-shaded sections below. It is recommended that for each program name you assign a unique identifier to help distinguish individual programs. This unique number can be any number of your choosing, but it should be simple and clear so that you and HUD can track tasks and results under the program and collect appropriate file documentation tied to this program.

- One way to number your programs is chronologically. For example, you could number your programs 2011-1, 2011-2, 2011-3, etc.
- Or, you may wish to number the programs based on type. For example rental 1, rental 2, homebuyer 1, homebuyer 2 etc. This type of numbering system might be appropriate if you have many programs that last over several years.
- Finally, you may wish to use an outline style of numbering. For example, all programs under your first eligible activity would start with the number 1 and then be consecutively numbered as 1.1, 1.2, 1.3, etc. The programs under the second eligible activity would be numbered as 2.1, 2.2, 2.3, etc.

**APR: REPORTING ON PROGRAM YEAR PROGRESS (NAHASDA § 404(b))**

Complete the shaded section of text below to describe your completed program tasks and actual results. Only report on activities completed during the 12-month program year. Financial data should be presented using the same basis of accounting as the Schedule of Expenditures of Federal Awards (SEFA) in the annual OMB Circular A-133 audit. For unit accomplishments, only count units when the unit was completed and occupied during the year. For households, only count the household if it received the assistance during the previous 12-month program year.

<p><b>1.1. Program Name and Unique Identifier:</b> <b>Modernization of 1937 Act Housing: Conversion of Rental Units to Homebuyer Units – 1801</b></p>
<p><b>1.2. Program Description</b> <i>(This should be the description of the planned program.):</i> Transition from the rental program to the lease-purchase program for qualified families upon successful completion of homebuyer education and financial readiness requirements.</p>
<p><b>1.3. Eligible Activity Number</b> <i>(Select one activity from the Eligible Activity list. Do not combine homeownership and rental housing in one activity, so that when housing units are reported in the APR they are correctly identified as homeownership or rental.):</i>  (1) Modernization of 1937 Act Housing [202(1)]</p>
<p><b>1.4. Intended Outcome Number</b> <i>(Select one outcome from the Outcome list. Each program can have only one outcome. If more than one outcome applies, create a separate program for each outcome.):</i>  (2) Assist renters to become homeowners</p>
<p><b>Describe Other Intended Outcome</b> <i>(Only if you selected "Other" above.):</i></p>
<p><b>1.5. Actual Outcome Number</b> <i>(In the APR identify the actual outcome from the Outcome list.):</i>  (2) Assist renters to become homeowners</p>

**Describe Other Intended Outcome** (Only if you selected "Other" above.):

**1.6. Who Will Be Assisted** (Describe the types of households that will be assisted under the program. Please note: assistance made available to families whose incomes fall within 80 to 100 percent of the median should be included as a separate program within this section.):

Low income Coquille Tribal members residing in rental program units.

**1.7. Types and Level of Assistance** (Describe the types and the level of assistance that will be provided to each household, as applicable.):

Qualified families will be transitioned from the rental program to the lease-purchase program upon successful completion of homebuyer education and financial readiness requirements. Families may choose to make modest improvements to the unit to be financed as part of the home purchase. Work may be performed by contractors or, if qualified, by the participant. The improvement allowance will be calculated to ensure that the participant's monthly payment does not exceed 30% of the family's adjusted income and is capped at \$15,000 per unit.

**1.8. APR:** (Describe the accomplishments for the APR in the 12-month program year. In accordance with 24 CFR § 1000.512(b)(3), provide an analysis and explanation of cost overruns or high unit costs.):

One family in the low rent program completed homebuyer counseling and transitioned to the HomeGO homebuyer program during the period. Two families completed counseling but did not begin the transition process before year end. One additional family was identified for potential transition and began counseling.

**1.9. Planned and Actual Outputs for 12-Month Program Year**

Planned Number of <b>Units</b> to be Completed in Year Under this Program	Planned Number of <b>Households</b> To Be Served in Year Under this Program	Planned Number of <b>Acres</b> To Be Purchased in Year Under this Program	APR: Actual Number of <b>Units</b> Completed in Program Year	APR: Actual Number of <b>Households</b> Served in Program Year	APR: Actual Number of <b>Acres</b> Purchased in Program Year
1	N/A	N/A	1	N/A	N/A

**1.10. APR:** If the program is behind schedule, explain why. (24 CFR § 1000.512(b)(2))

Program is on schedule.

**IHP: PLANNED PROGRAM YEAR ACTIVITIES (NAHASDA § 102(b)(2)(A))**

For each planned activity, complete all the non-shaded sections below. It is recommended that for each program name you assign a unique identifier to help distinguish individual programs. This unique number can be any number of your choosing, but it should be simple and clear so that you and HUD can track tasks and results under the program and collect appropriate file documentation tied to this program.

- One way to number your programs is chronologically. For example, you could number your programs 2011-1, 2011-2, 2011-3, etc.
- Or, you may wish to number the programs based on type. For example rental 1, rental 2, homebuyer 1, homebuyer 2 etc. This type of numbering system might be appropriate if you have many programs that last over several years.
- Finally, you may wish to use an outline style of numbering. For example, all programs under your first eligible activity would start with the number 1 and then be consecutively numbered as 1.1, 1.2, 1.3, etc. The programs under the second eligible activity would be numbered as 2.1, 2.2, 2.3, etc.

**APR: REPORTING ON PROGRAM YEAR PROGRESS (NAHASDA § 404(b))**

Complete the shaded section of text below to describe your completed program tasks and actual results. Only report on activities completed during the 12-month program year. Financial data should be presented using the same basis of accounting as the Schedule of Expenditures of Federal Awards (SEFA) in the annual OMB Circular A-133 audit. For unit accomplishments, only count units when the unit was completed and occupied during the year. For households, only count the household if it received the assistance during the previous 12-month program year.

<p><b>2.1. Program Name and Unique Identifier:</b> <b>Operation and Maintenance of 1937 Housing Act Units – 1802</b></p>
<p><b>2.2. Program Description</b> <i>(This should be the description of the planned program.):</i> Operation and maintenance of 1937 Housing Act units, community facilities, and common areas.</p>
<p><b>2.3. Eligible Activity Number</b> <i>(Select one activity from the Eligible Activity list. Do not combine homeownership and rental housing in one activity, so that when housing units are reported in the APR they are correctly identified as homeownership or rental.):</i>  (2) Operation of 1937 Act Housing [202(1)]</p>
<p><b>2.4. Intended Outcome Number</b> <i>(Select one outcome from the Outcome list. Each program can have only one outcome. If more than one outcome applies, create a separate program for each outcome.):</i>  (6) Assist affordable housing for low income households</p>
<p><b>Describe Other Intended Outcome</b> <i>(Only if you selected "Other" above.):</i></p>
<p><b>2.5. Actual Outcome Number</b> <i>(In the APR identify the actual outcome from the Outcome list.):</i>  (6) Assist affordable housing for low income households</p>

Describe Other Intended Outcome (Only if you selected "Other" above.):

2.6. Who Will Be Assisted (Describe the types of households that will be assisted under the program. Please note: assistance made available to families whose incomes fall within 80 to 100 percent of the median should be included as a separate program within this section.):

Low income Native Americans and Alaska Natives residing in 1937 Housing Act units.

2.7. Types and Level of Assistance (Describe the types and the level of assistance that will be provided to each household, as applicable.):

Activities include:

- a. Maintaining a 95% occupancy rate in rental units.
b. Performing routine and periodic maintenance as scheduled.
c. Performing emergency and non-routine maintenance as needed.
d. Preparing units for re-occupancy in a timely manner.
e. Reducing water and maintenance requirements, incorporating indigenous plants and materials, and improving the overall appearance of the front yard of one rental unit.
f. Maintaining and making minor improvements to community facilities and common areas.
g. Continuing use of two adjacent units as an interim maintenance operations and storage facility pending warehouse replacement.

Work will be performed by Housing Authority staff or contractors, generally at no cost to residents. Yard improvements are capped at \$2.00 per square foot. Costs to remedy damage or failure to perform required maintenance tasks will be assessed to residents in accordance with policy.

2.8. APR: (Describe the accomplishments for the APR in the 12-month program year. In accordance with 24 CFR § 1000.512(b)(3), provide an analysis and explanation of cost overruns or high unit costs.):

- a. Low rent units, including one emergency housing unit, were maintained at an occupancy rate of 93% throughout the year.
b. Routine maintenance was performed on rental units in conjunction with annual inspection and upon request. Periodic maintenance was performed on 12 units simultaneous with turnover.
c. Emergency maintenance was not required. Non-routine maintenance included appliance and flooring replacement.
d. Preparation for re-occupancy averaged 135 calendar days.
e. Made landscaping improvements to the front lawn of one rental unit.
f. Performed routine maintenance on common areas and facilities.
g. Continued use of two units as interim maintenance operations and storage facility through completion of warehouse replacement project. (See Section 3, Program 8.)

**2.9. Planned and Actual Outputs for 12-Month Program Year**

Planned Number of <b>Units</b> to be Completed in Year Under this Program	Planned Number of <b>Households</b> To Be Served in Year Under this Program	Planned Number of <b>Acres</b> To Be Purchased in Year Under this Program	APR: Actual Number of <b>Units</b> Completed in Program Year	APR: Actual Number of <b>Households</b> Served in Program Year	APR: Actual Number of <b>Acres</b> Purchased in Program Year
57	N/A	N/A	57	N/A	N/A

**2.10. APR:** If the program is behind schedule, explain why. (24 CFR § 1000.512(b)(2))

Program is on schedule. The average preparation for reoccupancy time increased due to focus on completion of the warehouse replacement project but did not substantially impact the occupancy rate for the period.

**IHP: PLANNED PROGRAM YEAR ACTIVITIES (NAHASDA § 102(b)(2)(A))**

For each planned activity, complete all the non-shaded sections below. It is recommended that for each program name you assign a unique identifier to help distinguish individual programs. This unique number can be any number of your choosing, but it should be simple and clear so that you and HUD can track tasks and results under the program and collect appropriate file documentation tied to this program.

- One way to number your programs is chronologically. For example, you could number your programs 2011-1, 2011-2, 2011-3, etc.
- Or, you may wish to number the programs based on type. For example rental 1, rental 2, homebuyer 1, homebuyer 2 etc. This type of numbering system might be appropriate if you have many programs that last over several years.
- Finally, you may wish to use an outline style of numbering. For example, all programs under your first eligible activity would start with the number 1 and then be consecutively numbered as 1.1, 1.2, 1.3, etc. The programs under the second eligible activity would be numbered as 2.1, 2.2, 2.3, etc.

**APR: REPORTING ON PROGRAM YEAR PROGRESS (NAHASDA § 404(b))**

Complete the shaded section of text below to describe your completed program tasks and actual results. Only report on activities completed during the 12-month program year. Financial data should be presented using the same basis of accounting as the Schedule of Expenditures of Federal Awards (SEFA) in the annual OMB Circular A-133 audit. For unit accomplishments, only count units when the unit was completed and occupied during the year. For households, only count the household if it received the assistance during the previous 12-month program year.

<p><b>3.1. Program Name and Unique Identifier:</b> <b>Tenant Based Rental Assistance – 1809.1</b></p>
<p><b>3.2. Program Description</b> <i>(This should be the description of the planned program.):</i> Assistance to eligible low income Native Americans and Alaska Natives to pay rent in private market rental units.</p>
<p><b>3.3. Eligible Activity Number</b> <i>(Select one activity from the Eligible Activity list. Do not combine homeownership and rental housing in one activity, so that when housing units are reported in the APR they are correctly identified as homeownership or rental.):</i> (17) Tenant Based Rental Assistance [202(3)]</p>
<p><b>3.4. Intended Outcome Number</b> <i>(Select one outcome from the Outcome list. Each program can have only one outcome. If more than one outcome applies, create a separate program for each outcome.):</i> (6) Assist affordable housing for low income households</p>
<p><b>Describe Other Intended Outcome</b> <i>(Only if you selected "Other" above.):</i></p>
<p><b>3.5. Actual Outcome Number</b> <i>(In the APR identify the actual outcome from the Outcome list.):</i> (6) Assist affordable housing for low income households</p>



**Describe Other Intended Outcome** (Only if you selected "Other" above.):

**3.6. Who Will Be Assisted** (Describe the types of households that will be assisted under the program. Please note: assistance made available to families whose incomes fall within 80 to 100 percent of the median should be included as a separate program within this section.):

Low income Native Americans and Alaska Natives.

**3.7. Types and Level of Assistance** (Describe the types and the level of assistance that will be provided to each household, as applicable.):

Activities include:

- Providing financial assistance to eligible low income Native Americans and Alaska Natives to pay rent in private market rental units.
- Maintaining a 100% utilization rate.

Subsidy will be paid to participant upon receipt of documentation that the full month's rent has been paid to the landlord. The standard subsidy rate will be supplemented if necessary to ensure participant pays no more than 30% of family adjusted income for rent, capped at fair market.

**3.8. APR:** (Describe the accomplishments for the APR in the 12-month program year. In accordance with 24 CFR § 1000.512(b)(3), provide an analysis and explanation of cost overruns or high unit costs.):

- Provided subsidy to eligible low income Native Americans and Alaska Natives to assist with payment of rent in private market rental units.
- Maintained a 100% utilization rate.

**3.9. Planned and Actual Outputs for 12-Month Program Year**

Planned Number of <b>Units</b> to be Completed in Year Under this Program	Planned Number of <b>Households</b> To Be Served in Year Under this Program	Planned Number of <b>Acres</b> To Be Purchased in Year Under this Program	APR: Actual Number of <b>Units</b> Completed in Program Year	APR: Actual Number of <b>Households</b> Served in Program Year	APR: Actual Number of <b>Acres</b> Purchased in Program Year
N/A	60	N/A	N/A	60	N/A

**3.10. APR:** If the program is behind schedule, explain why. (24 CFR § 1000.512(b)(2))

Program is on schedule.

**IHP: PLANNED PROGRAM YEAR ACTIVITIES (NAHASDA § 102(b)(2)(A))**

For each planned activity, complete all the non-shaded sections below. It is recommended that for each program name you assign a unique identifier to help distinguish individual programs. This unique number can be any number of your choosing, but it should be simple and clear so that you and HUD can track tasks and results under the program and collect appropriate file documentation tied to this program.

- One way to number your programs is chronologically. For example, you could number your programs 2011-1, 2011-2, 2011-3, etc.
- Or, you may wish to number the programs based on type. For example rental 1, rental 2, homebuyer 1, homebuyer 2 etc. This type of numbering system might be appropriate if you have many programs that last over several years.
- Finally, you may wish to use an outline style of numbering. For example, all programs under your first eligible activity would start with the number 1 and then be consecutively numbered as 1.1, 1.2, 1.3, etc. The programs under the second eligible activity would be numbered as 2.1, 2.2, 2.3, etc.

**APR: REPORTING ON PROGRAM YEAR PROGRESS (NAHASDA § 404(b))**

Complete the shaded section of text below to describe your completed program tasks and actual results. Only report on activities completed during the 12-month program year. Financial data should be presented using the same basis of accounting as the Schedule of Expenditures of Federal Awards (SEFA) in the annual OMB Circular A-133 audit. For unit accomplishments, only count units when the unit was completed and occupied during the year. For households, only count the household if it received the assistance during the previous 12-month program year.

<p><b>4.1. Program Name and Unique Identifier:</b> <b>Housing Services – 1809.2</b></p>
<p><b>4.2. Program Description</b> <i>(This should be the description of the planned program.):</i> Provision of housing-related services to program participants, applicants, contractors, and others participating or seeking to participate in affordable housing activities.</p>
<p><b>4.3. Eligible Activity Number</b> <i>(Select one activity from the Eligible Activity list. Do not combine homeownership and rental housing in one activity, so that when housing units are reported in the APR they are correctly identified as homeownership or rental.):</i> (18) Other Housing Services [202(3)]</p>
<p><b>4.4. Intended Outcome Number</b> <i>(Select one outcome from the Outcome list. Each program can have only one outcome. If more than one outcome applies, create a separate program for each outcome.):</i> (6) Assist affordable housing for low income households</p>
<p><b>Describe Other Intended Outcome</b> <i>(Only if you selected "Other" above.):</i></p>
<p><b>4.5. Actual Outcome Number</b> <i>(In the APR identify the actual outcome from the Outcome list.):</i> (6) Assist affordable housing for low income households</p>

**Describe Other Intended Outcome** *(Only if you selected "Other" above.):*

**4.6. Who Will Be Assisted** *(Describe the types of households that will be assisted under the program. Please note: assistance made available to families whose incomes fall within 80 to 100 percent of the median should be included as a separate program within this section.):*

Low income Native American and Alaska Native applicants and housing program participants.

**4.7. Types and Level of Assistance** *(Describe the types and the level of assistance that will be provided to each household, as applicable.):*

Activities include:

- a. Providing materials and instruction in housekeeping practices and living habits that reduce maintenance costs, improve housekeeping, and promote resident safety.
- b. Providing compliance and performance incentives to program participants.
- c. Counseling current and prospective homebuyers on maintenance and financial responsibilities.
- d. Providing support for meetings and activities of the Residents Association.
- e. Maintaining partnerships with Tribal and other community social and support services providers and referring applicants and participants as necessary.
- f. Promoting and facilitating employment opportunities, financial literacy, emergency preparedness, homebuyer education, participation in Individual Development Account savings programs and other financial assistance programs for first-time homebuyers, access to the Section 184 program, and other programs and services that enhance participant self-sufficiency.
- g. Providing rental space at a reduced rate to Tribal programs and community partners that directly promote the self-sufficiency of program participants

Services will be provided by Housing Authority staff or other service providers at minimal or no cost to applicants or participants.

**4.8. APR:** *(Describe the accomplishments for the APR in the 12-month program year. In accordance with 24 CFR § 1000.512(b)(3), provide an analysis and explanation of cost overruns or high unit costs.):*

- a. Materials and instruction in housekeeping practices and living habits that reduce maintenance costs were provided during orientation and as needed during inspections or maintenance calls. Resident safety was encouraged through orientation materials, monthly newsletter articles, and participation in emergency preparedness activities.
- b. Incentives ranging in value from \$25 to \$150 per household were awarded to program participants based on performance during the prior one-year period.
- c. Four families in the low rent program participated in homebuyer counseling during the period. Facilitated access to the Section 184 program for four Tribal families. Continued work with Tribal attorney to facilitate access to VA Native American Direct Loan program for one Tribal family.
- d. Promoted and assisted with Residents Association meetings, fundraisers, and other activities.
- e. Maintained partnerships with Tribal and community providers for social services, mental health counseling, elder support services, education, employment, financial literacy and counseling, energy assistance, move-in assistance, and other support services.

- f. Opportunities for employment, financial literacy, emergency preparedness, homebuyer education, participation in Individual Development Account savings programs and other financial assistance programs for first-time homebuyers, access to the Section 184 program, and other programs and services that enhance participant self-sufficiency were publicized at Tribal events; in the Housing Authority’s monthly newsletter, the Tribe’s monthly newspaper, and other publications; on the Tribe’s website; and, by door to door delivery of notices to housing community residents. Participants and applicants were also individually referred to service providers as the opportunity or need arose.
- g. Space in the Housing Authority office was provided for the Tribe’s tsunami alert system and emergency communications equipment serving the housing community and surrounding area. One unit was leased to the Tribal Police Department at a reduced rate for use as office space and as a substation for the Coos County Sheriff’s Department to promote community safety. One rental unit was leased to the South Coast Interagency Narcotics Team at a reduced rate for use as office space to support illegal drug interdiction within the housing community and to protect the housing community from widespread illegal drug activity in the area immediately surrounding Tribal lands.

**4.9. Planned and Actual Outputs for 12-Month Program Year**

Planned Number of <b>Units</b> to be Completed in Year Under this Program	Planned Number of <b>Households</b> To Be Served in Year Under this Program	Planned Number of <b>Acres</b> To Be Purchased in Year Under this Program	APR: Actual Number of <b>Units</b> Completed in Program Year	APR: Actual Number of <b>Households</b> Served in Program Year	APR: Actual Number of <b>Acres</b> Purchased in Program Year
N/A	123	N/A	N/A	123	N/A

**4.10. APR:** If the program is behind schedule, explain why. (24 CFR § 1000.512(b)(2))  
Program is on schedule.

**IHP: PLANNED PROGRAM YEAR ACTIVITIES (NAHASDA § 102(b)(2)(A))**

For each planned activity, complete all the non-shaded sections below. It is recommended that for each program name you assign a unique identifier to help distinguish individual programs. This unique number can be any number of your choosing, but it should be simple and clear so that you and HUD can track tasks and results under the program and collect appropriate file documentation tied to this program.

- One way to number your programs is chronologically. For example, you could number your programs 2011-1, 2011-2, 2011-3, etc.
- Or, you may wish to number the programs based on type. For example rental 1, rental 2, homebuyer 1, homebuyer 2 etc. This type of numbering system might be appropriate if you have many programs that last over several years.
- Finally, you may wish to use an outline style of numbering. For example, all programs under your first eligible activity would start with the number 1 and then be consecutively numbered as 1.1, 1.2, 1.3, etc. The programs under the second eligible activity would be numbered as 2.1, 2.2, 2.3, etc.

**APR: REPORTING ON PROGRAM YEAR PROGRESS (NAHASDA § 404(b))**

Complete the shaded section of text below to describe your completed program tasks and actual results. Only report on activities completed during the 12-month program year. Financial data should be presented using the same basis of accounting as the Schedule of Expenditures of Federal Awards (SEFA) in the annual OMB Circular A-133 audit. For unit accomplishments, only count units when the unit was completed and occupied during the year. For households, only count the household if it received the assistance during the previous 12-month program year.

<p><b>5.1. Program Name and Unique Identifier:</b> <b>Housing Management Services – 1810.1</b></p>
<p><b>5.2. Program Description</b> <i>(This should be the description of the planned program.):</i> Management of affordable housing programs.</p>
<p><b>5.3. Eligible Activity Number</b> <i>(Select one activity from the Eligible Activity list. Do not combine homeownership and rental housing in one activity, so that when housing units are reported in the APR they are correctly identified as homeownership or rental.):</i> (19) Housing Management Services [202(4)]</p>
<p><b>5.4. Intended Outcome Number</b> <i>(Select one outcome from the Outcome list. Each program can have only one outcome. If more than one outcome applies, create a separate program for each outcome.):</i> (6) Assist affordable housing for low income households</p>
<p><b>Describe Other Intended Outcome</b> <i>(Only if you selected "Other" above.):</i></p>
<p><b>5.5. Actual Outcome Number</b> <i>(In the APR identify the actual outcome from the Outcome list.):</i> (6) Assist affordable housing for low income households</p>

<p><b>Describe Other Intended Outcome</b> (Only if you selected "Other" above.):</p>
<p><b>5.6. Who Will Be Assisted</b> (Describe the types of households that will be assisted under the program. Please note: assistance made available to families whose incomes fall within 80 to 100 percent of the median should be included as a <u>separate</u> program within this section.):</p> <p>Low income Native American and Alaska Native applicants and housing program participants.</p>
<p><b>5.7. Types and Level of Assistance</b> (Describe the types and the level of assistance that will be provided to each household, as applicable.):</p> <p>Activities include:</p> <ul style="list-style-type: none"> <li>a. Managing rental and homebuyer programs.</li> <li>b. Screening applications to determine program eligibility.</li> <li>c. Maintaining a waiting list of qualified low income Native American and Alaska Native families and making placement when assistance becomes available.</li> <li>d. Conducting annual and interim recertifications of family income and composition.</li> <li>e. Inspecting rental units at least once per year and homebuyer units at least every three years, and documenting and monitoring the correction of deficiencies.</li> </ul> <p>Work will be performed by Housing Authority staff at no cost to resident.</p>
<p><b>5.8. APR:</b> (Describe the accomplishments for the APR in the 12-month program year. In accordance with 24 CFR § 1000.512(b)(3), provide an analysis and explanation of cost overruns or high unit costs.):</p> <ul style="list-style-type: none"> <li>a. Managed Low Rent, MHAP (tenant-based rental assistance), HomeGO (homebuyer lease-purchase), and Section 184 programs.</li> <li>b. Screened 78 applications for assistance to determine program eligibility.</li> <li>c. Maintained a waiting list of qualified low income Indian families and made placements when assistance became available.</li> <li>d. Conducted annual and interim recertifications of family income and composition.</li> <li>e. Inspected all rental and homebuyer units at least once during the period. Documented and monitored correction of deficiencies.</li> </ul>

**5.9. Planned and Actual Outputs for 12-Month Program Year**

Planned Number of <b>Units</b> to be Completed in Year Under this Program	Planned Number of <b>Households</b> To Be Served in Year Under this Program	Planned Number of <b>Acres</b> To Be Purchased in Year Under this Program	APR: Actual Number of <b>Units</b> Completed in Program Year	APR: Actual Number of <b>Households</b> Served in Program Year	APR: Actual Number of <b>Acres</b> Purchased in Program Year
N/A	123	N/A	N/A	123	N/A

**5.10. APR:** If the program is behind schedule, explain why. (24 CFR § 1000.512(b)(2))

Program is on schedule.

**IHP: PLANNED PROGRAM YEAR ACTIVITIES (NAHASDA § 102(b)(2)(A))**

For each planned activity, complete all the non-shaded sections below. It is recommended that for each program name you assign a unique identifier to help distinguish individual programs. This unique number can be any number of your choosing, but it should be simple and clear so that you and HUD can track tasks and results under the program and collect appropriate file documentation tied to this program.

- One way to number your programs is chronologically. For example, you could number your programs 2011-1, 2011-2, 2011-3, etc.
- Or, you may wish to number the programs based on type. For example rental 1, rental 2, homebuyer 1, homebuyer 2 etc. This type of numbering system might be appropriate if you have many programs that last over several years.
- Finally, you may wish to use an outline style of numbering. For example, all programs under your first eligible activity would start with the number 1 and then be consecutively numbered as 1.1, 1.2, 1.3, etc. The programs under the second eligible activity would be numbered as 2.1, 2.2, 2.3, etc.

**APR: REPORTING ON PROGRAM YEAR PROGRESS (NAHASDA § 404(b))**

Complete the shaded section of text below to describe your completed program tasks and actual results. Only report on activities completed during the 12-month program year. Financial data should be presented using the same basis of accounting as the Schedule of Expenditures of Federal Awards (SEFA) in the annual OMB Circular A-133 audit. For unit accomplishments, only count units when the unit was completed and occupied during the year. For households, only count the household if it received the assistance during the previous 12-month program year.

<p><b>6.1. Program Name and Unique Identifier:</b> <b>Operation and Maintenance of NAHASDA Units – 1810.2</b></p>
<p><b>6.2. Program Description</b> <i>(This should be the description of the planned program.):</i> Operation and maintenance of NAHASDA units and community facilities.</p>
<p><b>6.3. Eligible Activity Number</b> <i>(Select one activity from the Eligible Activity list. Do not combine homeownership and rental housing in one activity, so that when housing units are reported in the APR they are correctly identified as homeownership or rental.):</i> (20) Operation and Maintenance of NAHASDA-Assisted Units [202(4)]</p>
<p><b>6.4. Intended Outcome Number</b> <i>(Select one outcome from the Outcome list. Each program can have only one outcome. If more than one outcome applies, create a separate program for each outcome.):</i> (6) Assist affordable housing for low income households</p>
<p><b>Describe Other Intended Outcome</b> <i>(Only if you selected "Other" above.):</i></p>
<p><b>6.5. Actual Outcome Number</b> <i>(In the APR identify the actual outcome from the Outcome list.):</i> (6) Assist affordable housing for low income households</p>
<p><b>Describe Other Intended Outcome</b> <i>(Only if you selected "Other" above.):</i></p>



**6.6. Who Will Be Assisted** *(Describe the types of households that will be assisted under the program. Please note: assistance made available to families whose incomes fall within 80 to 100 percent of the median should be included as a separate program within this section.):*

Low income Native Americans and Alaska Natives residing in NAHASDA units.

**6.7. Types and Level of Assistance** *(Describe the types and the level of assistance that will be provided to each household, as applicable.):*

Activities include:

- a. Maintaining a 95% occupancy rate in rental units.
- b. Performing routine and periodic maintenance as scheduled.
- c. Performing emergency and non-routine maintenance as needed.
- d. Preparing units for re-occupancy in a timely manner.
- e. Reducing water and maintenance requirements, incorporating indigenous plants and materials, and improving the overall appearance of the front yard of one rental unit.
- f. Maintaining and making minor improvements to community facilities and common areas.

Work will be performed by Housing Authority staff or contractors, generally at no cost to residents. Yard improvements are capped at \$2.00 per square foot. Costs to remedy damage or failure to perform required maintenance tasks will be assessed to residents in accordance with policy.

**6.8. APR:** *(Describe the accomplishments for the APR in the 12-month program year. In accordance with 24 CFR § 1000.512(b)(3), provide an analysis and explanation of cost overruns or high unit costs.):*

- a. Low rent units were maintained at an occupancy rate of 93% throughout the year.
- b. Routine maintenance was performed on rental units in conjunction with annual inspection and upon request.
- c. Emergency and non-routine maintenance were not required.
- d. No units required preparation for re-occupancy.
- e. The rental selected for improvement this year was not a NAHASDA unit.
- f. Performed routine maintenance on common areas and facilities.

**6.9. Planned and Actual Outputs for 12-Month Program Year**

Planned Number of <b>Units</b> to be Completed in Year Under this Program	Planned Number of <b>Households</b> To Be Served in Year Under this Program	Planned Number of <b>Acres</b> To Be Purchased in Year Under this Program	APR: Actual Number of <b>Units</b> Completed in Program Year	APR: Actual Number of <b>Households</b> Served in Program Year	APR: Actual Number of <b>Acres</b> Purchased in Program Year
6	N/A	N/A	6	N/A	N/A

**6.10. APR:** If the program is behind schedule, explain why. (24 CFR § 1000.512(b)(2))

Program is on schedule.

**IHP: PLANNED PROGRAM YEAR ACTIVITIES (NAHASDA § 102(b)(2)(A))**

For each planned activity, complete all the non-shaded sections below. It is recommended that for each program name you assign a unique identifier to help distinguish individual programs. This unique number can be any number of your choosing, but it should be simple and clear so that you and HUD can track tasks and results under the program and collect appropriate file documentation tied to this program.

- One way to number your programs is chronologically. For example, you could number your programs 2011-1, 2011-2, 2011-3, etc.
- Or, you may wish to number the programs based on type. For example rental 1, rental 2, homebuyer 1, homebuyer 2 etc. This type of numbering system might be appropriate if you have many programs that last over several years.
- Finally, you may wish to use an outline style of numbering. For example, all programs under your first eligible activity would start with the number 1 and then be consecutively numbered as 1.1, 1.2, 1.3, etc. The programs under the second eligible activity would be numbered as 2.1, 2.2, 2.3, etc.

**APR: REPORTING ON PROGRAM YEAR PROGRESS (NAHASDA § 404(b))**

Complete the shaded section of text below to describe your completed program tasks and actual results. Only report on activities completed during the 12-month program year. Financial data should be presented using the same basis of accounting as the Schedule of Expenditures of Federal Awards (SEFA) in the annual OMB Circular A-133 audit. For unit accomplishments, only count units when the unit was completed and occupied during the year. For households, only count the household if it received the assistance during the previous 12-month program year.

<p><b>7.1. Program Name and Unique Identifier:</b> <b>Crime Prevention and Safety – 1811</b></p>
<p><b>7.2. Program Description</b> <i>(This should be the description of the planned program.):</i> Provision of safety, security, and law enforcement measures and activities appropriate to protect residents of affordable housing from crime.</p>
<p><b>7.3. Eligible Activity Number</b> <i>(Select one activity from the Eligible Activity list. Do not combine homeownership and rental housing in one activity, so that when housing units are reported in the APR they are correctly identified as homeownership or rental.):</i> (21) Crime Prevention and Safety [202(5)]</p>
<p><b>7.4. Intended Outcome Number</b> <i>(Select one outcome from the Outcome list. Each program can have only one outcome. If more than one outcome applies, create a separate program for each outcome.):</i> (11) Reduction in crime reports</p>
<p><b>Describe Other Intended Outcome</b> <i>(Only if you selected "Other" above.):</i></p>
<p><b>7.5. Actual Outcome Number</b> <i>(In the APR identify the actual outcome from the Outcome list.):</i> (11) Reduction in crime reports</p>

**Describe Other Intended Outcome** (Only if you selected "Other" above.):

**7.6. Who Will Be Assisted** (Describe the types of households that will be assisted under the program. Please note: assistance made available to families whose incomes fall within 80 to 100 percent of the median should be included as a separate program within this section.):

Low income Native American and Alaska Native rental and homebuyer program participants.

**7.7. Types and Level of Assistance** (Describe the types and the level of assistance that will be provided to each household, as applicable.):

Activities include:

- a. Maintaining an agreement with Tribal Police to provide services to the low income housing community.
- b. Providing security monitoring and electronic surveillance of housing facilities.
- c. Installing informational, directional, and traffic control signage and devices in the housing community as needed.

Services will be provided by Tribal Police, Housing Authority staff, contractors, or other service providers at no cost to residents.

**7.8. APR:** (Describe the accomplishments for the APR in the 12-month program year. In accordance with 24 CFR § 1000.512(b)(3), provide an analysis and explanation of cost overruns or high unit costs.):

- a. Continued agreement with Tribal Police to provide services to the low income housing community.
- b. Contracted for security services and electronic surveillance of housing facilities.
- c. Installation of informational, directional, and traffic control signage was not required during the period.

**7.9. Planned and Actual Outputs for 12-Month Program Year**

Planned Number of <b>Units</b> to be Completed in Year Under this Program	Planned Number of <b>Households</b> To Be Served in Year Under this Program	Planned Number of <b>Acres</b> To Be Purchased in Year Under this Program	APR: Actual Number of <b>Units</b> Completed in Program Year	APR: Actual Number of <b>Households</b> Served in Program Year	APR: Actual Number of <b>Acres</b> Purchased in Program Year
N/A	N/A	N/A	N/A	N/A	N/A

**7.10. APR:** If the program is behind schedule, explain why. (24 CFR § 1000.512(b)(2))

Program is on schedule.

**IHP: PLANNED PROGRAM YEAR ACTIVITIES (NAHASDA § 102(b)(2)(A))**

For each planned activity, complete all the non-shaded sections below. It is recommended that for each program name you assign a unique identifier to help distinguish individual programs. This unique number can be any number of your choosing, but it should be simple and clear so that you and HUD can track tasks and results under the program and collect appropriate file documentation tied to this program.

- One way to number your programs is chronologically. For example, you could number your programs 2011-1, 2011-2, 2011-3, etc.
- Or, you may wish to number the programs based on type. For example rental 1, rental 2, homebuyer 1, homebuyer 2 etc. This type of numbering system might be appropriate if you have many programs that last over several years.
- Finally, you may wish to use an outline style of numbering. For example, all programs under your first eligible activity would start with the number 1 and then be consecutively numbered as 1.1, 1.2, 1.3, etc. The programs under the second eligible activity would be numbered as 2.1, 2.2, 2.3, etc.

**APR: REPORTING ON PROGRAM YEAR PROGRESS (NAHASDA § 404(b))**

Complete the shaded section of text below to describe your completed program tasks and actual results. Only report on activities completed during the 12-month program year. Financial data should be presented using the same basis of accounting as the Schedule of Expenditures of Federal Awards (SEFA) in the annual OMB Circular A-133 audit. For unit accomplishments, only count units when the unit was completed and occupied during the year. For households, only count the household if it received the assistance during the previous 12-month program year.

<p><b>8.1. Program Name and Unique Identifier:</b> <b>Replacement of Projects and Maintenance Operations and Storage Facility – 1812</b></p>
<p><b>8.2. Program Description</b> <i>(This should be the description of the planned program.):</i> Reconstruction of the Authority’s projects and maintenance operations and storage facility reusing the existing concrete slab foundation.</p>
<p><b>8.3. Eligible Activity Number</b> <i>(Select one activity from the Eligible Activity list. Do not combine homeownership and rental housing in one activity, so that when housing units are reported in the APR they are correctly identified as homeownership or rental.):</i> (22) Model Activities [202(6)]</p>
<p><b>8.4. Intended Outcome Number</b> <i>(Select one outcome from the Outcome list. Each program can have only one outcome. If more than one outcome applies, create a separate program for each outcome.):</i> (6) Assist affordable housing for low income households</p>
<p><b>Describe Other Intended Outcome</b> <i>(Only if you selected "Other" above.):</i></p>
<p><b>8.5. Actual Outcome Number</b> <i>(In the APR identify the actual outcome from the Outcome list.):</i> (6) Assist affordable housing for low income households</p>

**Describe Other Intended Outcome** (Only if you selected "Other" above.):

**8.6. Who Will Be Assisted** (Describe the types of households that will be assisted under the program. Please note: assistance made available to families whose incomes fall within 80 to 100 percent of the median should be included as a separate program within this section.):  
Low income Native American and Alaska Native rental and homebuyer program participants.

**8.7. Types and Level of Assistance** (Describe the types and the level of assistance that will be provided to each household, as applicable.):  
Activities include:  
a. Complete construction of new building.  
b. Relocation from interim facilities to new building.  
Work will be performed by Housing Authority staff and contractors at no cost to residents.

**8.8. APR:** (Describe the accomplishments for the APR in the 12-month program year. In accordance with 24 CFR § 1000.512(b)(3), provide an analysis and explanation of cost overruns or high unit costs.):  
a. Completed construction 12/11/2017.  
b. Completed move in 06/22/2018.

**8.9. Planned and Actual Outputs for 12-Month Program Year**

Planned Number of <b>Units</b> to be Completed in Year Under this Program	Planned Number of <b>Households</b> To Be Served in Year Under this Program	Planned Number of <b>Acres</b> To Be Purchased in Year Under this Program	APR: Actual Number of <b>Units</b> Completed in Program Year	APR: Actual Number of <b>Households</b> Served in Program Year	APR: Actual Number of <b>Acres</b> Purchased in Program Year
N/A	N/A	N/A	N/A	N/A	N/A

**8.10. APR:** If the program is behind schedule, explain why. (24 CFR § 1000.512(b)(2))  
Project is complete.

## SECTION 4: MAINTAINING 1937 ACT UNITS, DEMOLITION, AND DISPOSITION

- (1) Maintaining 1937 Act Units** (NAHASDA § 102(b)(2)(A)(v)) *(Describe specifically how you will maintain and operate your 1937 Act housing units in order to ensure that these units will remain viable.):*

Maintenance, modernization and rehabilitation, and special projects work is performed by two full-time employees and one part-time employee, supplemented as needed by temporary staffing or service contractors.

CIHA has a comprehensive ongoing preventative maintenance program to prevent and correct deterioration of its housing units and other facilities. An inspection of each unit is performed at least once per year and more often as warranted. Counseling sessions are conducted to instruct tenants on maintenance, housekeeping, and safety issues at move-in and thereafter as needed.

CIHA staff continues to improve policies and procedures for recruitment, selection, orientation, training, and counseling of residents.

Tribal Police have been involved in serving eviction papers to residents who have damaged their homes. The Tribal Court has issued orders of eviction, where warranted, and has required some tenants who have damaged their homes to make restitution.

- (2) Demolition and Disposition** (NAHASDA § 102(b)(2)(A)(iv)(I-III)) *(Describe any planned demolition or disposition of 1937 Act housing units. Be certain to include the timetable for any planned demolition or disposition and any other information required by HUD with respect to the demolition or disposition.):*

There is no demolition or disposition planned.

**SECTION 5: BUDGETS**

**(1) Sources of Funding** (NAHASDA § 102(b)(2)(C)(i) and 404(b)) (Complete the **non-shaded** portions of the chart below to describe your estimated or anticipated sources of funding for the 12-month program year. **APR Actual Sources of Funding -- Please complete the shaded portions of the chart below to describe your actual funds received. Only report on funds actually received and under a grant agreement or other binding commitment during the 12-month program year.**)

SOURCE	IHP					APR					
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
	Estimated amount on hand at beginning of program year	Estimated amount to be received during 12-month program year	Estimated total sources of funds (A + B)	Estimated funds to be expended during 12-month program year	Estimated unexpended funds remaining at end of program year (C minus D)	Actual amount on hand at beginning of program year	Actual amount received during 12-month program year	Actual total sources of funding (F + G)	Actual funds expended during 12-month program year	Actual unexpended funds remaining at end of 12-month program year (H minus I)	Actual unexpended funds obligated but not expended at end of 12-month program year
1. IHBG Funds	119,859	982,500	1,102,359	1,102,359	0	173,810	1,074,776	1,248,586	1,189,714	58,872	0
2. IHBG Program Income	0	285,500	285,500	285,500	0	0	315,568	315,568	315,568	0	0
3. Title VI											
4. Title VI Program Income											
5. 1937 Act Operating Reserves											
6. Carry Over 1937 Act Funds											
<b>LEVERAGED FUNDS</b>											
7. ICDBG Funds											
8. Other Federal Funds											
9. LIHTC											
10. Non-Federal Funds	123,000	272,496	395,496	274,446	121,050	205,265	681,575	886,840	784,913	101,927	101,927
<b>TOTAL</b>	242,859	1,540,496	1,783,355	1,662,305	121,050	379,075	2,071,919	2,450,994	2,290,195	160,799	101,927

**Notes:**

- a. For the IHP, fill in columns A, B, C, D, and E (non-shaded columns). **For the APR, fill in columns F, G, H, I, J, and K (shaded columns).**
- b. Total of Column D should match the total of Column N from the **Uses Table** on the following page.
- c. **Total of Column I should match the Total of Column Q from the Uses Table on the following page.**
- d. For the IHP, describe any estimated leverage in Line 4 below (Estimated Sources or Uses of Funding). **For the APR, describe actual leverage in Line 5 below (APR).**



**(2) Uses of Funding** (NAHASDA § 102(b)(2)(C)(ii)) (Note that the budget should not exceed the total funds on hand (Column C) and insert as many rows as needed to include all the programs identified in Section 3. **Actual expenditures in the APR section are for the 12-month program year.**)

PROGRAM NAME (tie to program names in Section 3 above)	Unique Identifier	IHP			APR		
		(L)	(M)	(N)	(O)	(P)	(Q)
		Prior and current year IHBG (only) funds to be expended in 12-month program year	Total all other funds to be expended in 12-month program year	Total funds to be expended in 12-month program year (L + M)	Total IHBG (only) funds expended in 12-month program year	Total all other funds expended in 12-month program year	Total funds expended in 12-month program year (O + P)
Conversion of Rental Units to Homebuyer Units	1801	15,000	0	15,000	10,094	0	10,094
Operation and Maintenance of 1937 Housing Act Units	1802	362,532	157,500	520,032	414,572	201,638	616,210
Tenant Based Rental Assistance	1809.1	163,000	126,950	289,950	163,000	165,647	328,647
Housing Services	1809.2	20,000	0	20,000	16,501	0	16,501
Housing Management Services	1810.1	231,695	25,000	256,695	253,505	211	253,716
Operation and Maintenance of NAHASDA Units	1810.2	30,000	0	30,000	27,020	0	27,020
Crime Prevention and Safety	1811	30,000	0	30,000	30,000	0	30,000
Model Activities: Replacement of Projects and Maintenance Operations and Storage Facility	1812	53,632	147,496	201,128	69,555	641,120	710,675
Planning and Administration		196,500	0	196,500	205,467	0	205,467
Loan repayment – describe in 4 below		0	103,000	103,000	0	91,865	91,865
<b>TOTAL</b>		1,102,359	559,946	1,662,305	1,189,714	1,100,481	2,290,195

**Notes:**

- a. Total of Column L cannot exceed the IHBG funds from Column C, Row 1 from the Sources Table on the previous page.
- b. Total of Column M cannot exceed the IHBG funds from Column D, Rows 2-10 from the Sources Table on the previous page.
- c. **Total of Column O cannot exceed total IHBG funds received in Column H, Row 1 from the Sources table on the previous page.**
- d. **Total of Column P cannot exceed total of Column H, Rows 2-10 of the Sources Table on the previous page.**
- e. **Total of Column Q should equal total of Column I of the Sources Table on the previous page.**

(3) **Estimated Sources or Uses of Funding** (NAHASDA § 102(b)(2)(C)). (Provide any additional information about the estimated sources or uses of funding, including leverage (if any). You must provide the relevant information for any planned loan repayment listed in the Uses Table on the previous page. This planned loan repayment can be associated with Title VI or with private or tribal funding that is used for an eligible activity described in an IHP that has been determined to be in compliance by HUD. The text must describe which specific loan is planned to be repaid and the NAHASDA-eligible activity and program associated with this loan.):

**1809.1 Tenant Based Rental Assistance**

Estimated Tribal contributions in support of CIHA’s tenant-based rental assistance program total \$125,000.

**1812 Replacement of Projects and Maintenance Operations and Storage Facility and Loan Repayment**

This project was approved as a Model Activity in the Authority’s FY 2015 Indian Housing Plan. Funds set aside for completion of construction and relocation costs include bond and loan proceeds and non-program funds. Program income will be used for bond and loan repayment.

(4) **APR** (NAHASDA § 404(b)) (Enter any additional information about the actual sources or uses of funding, including leverage (if any). You must provide the relevant information for any actual loan repayment listed in the Uses Table on the previous page. The text must describe which loan was repaid and the NAHASDA-eligible activity and program associated with this loan.):

**1802 Operation and Maintenance of 19377 Housing Act Units**

Expense was greater than anticipated due to the purchase of small tools and equipment for the new warehouse building and increased utility and insurance costs.

**1809.1 Tenant Based Rental Assistance**

Additional subsidy was required for some participants to ensure they paid no more than 30% of income for rent.

**1812 Replacement of Projects and Maintenance Operations and Storage Facility and Loan Repayment**

As noted in the FY 2017 Annual Performance Report, the construction bid for the project exceeded funds available but remained within the established total development cost (TDC). A supplemental low-interest loan was obtained to cover the additional cost.

SECTION 6: OTHER SUBMISSION ITEMS

(1) Useful Life/Affordability Period(s) (NAHASDA § 205, 24 CFR § 1000.142) (Identify the useful life of each housing unit to be constructed, acquired, or rehabilitated with IHBG funds in the 12-month period. Exclude Mutual Help units.)

The useful life of the properties is dependent upon the amount of IHBG funds invested in the property per occurrence as shown in the following schedule:

Table with 2 columns: IHBG Funds Invested and Affordability Period. Rows range from up to \$5,000 (6 months) to over \$52,500 (20 years).

(2) Model Housing and Over-Income Activities (NAHASDA § 202(6), 24 CFR § 1000.108) (If you wish to undertake a model housing activity or wish to serve non-low income households during the 12-month program year, those activities may be described here, in the program description section of the 1-year plan, or as a separate submission.):

Work will be completed on the Model Activity approved in the Authority's FY 2015 Indian Housing Plan, Replacement of Projects and Maintenance Operations and Storage Facility. The project will enable CIHA to carry out its affordable housing activities in a safer, more efficient, and economical manner. Sixty-three 1937 Housing Act and NAHASDA low-income housing units located on Coquille Tribal trust lands in Coos Bay, Oregon will benefit from the project.

(3) Tribal and Other Indian Preference (NAHASDA § 201(b)(5), 24 CFR § 1000.120)

If preference will be given to tribal members or other Indian families, the preference policy must be described. This information may be provided here or in the program description section of the 1-year plan.

Does the Tribe have a preference policy? Yes [X] No [ ]

If yes, describe the policy. CIHA's order of preference is to first serve members of the Coquille Indian Tribe, then members of the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians, then other Native Americans and Alaska Natives. Homebuyer programs on Coquille Tribal Lands are available to Coquille Tribal members only.

(4) Anticipated Planning and Administration Expenses (NAHASDA § 102(b)(2)(C)(ii), 24 CFR § 1000.238)

Do you intend to use more than 20% of your current grant for Planning and Administration?

Yes [ ] No [X]

If yes, describe why the additional funds are needed for Administration. For a recipient administering funds from multiple grant beneficiaries with a mix of grant or expenditure amounts, for each beneficiary state the grant amount or expenditure amount, the cap percentage applied, and the actual dollar amount of the cap.

(5) Actual Planning and Administration Expenses (NAHASDA § 102(b)(2)(C)(ii), 24 CFR § 1000.238)

Did you expend more than 20% of your current grant for Planning and Administration?

Yes [ ] No [X]

If yes, did you receive HUD approval to exceed the 20% cap on Planning and Administration costs?

Yes [ ] No [ ]

If you did not receive approval for spending more than 20% of your current grant on planning and administration costs, describe the reason(s) for exceeding the 20% cap. (See Section 6, Line 5 of the Guidance for information on carry-over of unspent planning and administration expenses.)

(6) Expanded Formula Area – Verification of Substantial Housing Services (24 CFR § 1000.302(3))

If your Tribe has an expanded formula area, (i.e., an area that was justified based on housing services provided rather than the list of areas defined in 24 CFR § 1000.302 Formula Area (1)), the Tribe must demonstrate that it is continuing to provide substantial housing services to that expanded formula area. Does the Tribe have an expanded formula area?

**Indian Housing Block Grant (IHBG)**

**U.S. Department of Housing  
and Urban Development**

OMB Approval Number 2577-0218  
(exp. 03/31/16)

**IHP/APR**

Office of Public and Indian Housing  
Office of Native American Programs

Yes  No  If no, proceed to Section 7.

If yes, list each separate geographic area that has been added to the Tribe's formula area and the documented number of Tribal members residing there.

For each separate formula area expansion, list the budgeted amount of IHBG and other funds to be provided to all American Indian and Alaska Native (AIAN) households and to only those AIAN households with incomes 80% of median income or lower during the recipient's 12-month program year:

<b>Total Expenditures on Affordable Housing Activities for:</b>		
	<b>All AIAN Households</b>	<b>AIAN Households with Incomes 80% or less of Median Income</b>
<b>IHBG funds:</b>		
<b>Funds from other Sources:</b>		

**(7) APR:** For each separate formula area expansion, list the actual amount of IHBG and other funds expended for all AIAN households and for only AIAN households with incomes 80% of median income or lower during the recipient's 12-month program year.

<b>Total Expenditures on Affordable Housing Activities for:</b>		
	<b>All AIAN Households</b>	<b>AIAN Households with Incomes 80% or less of Median Income</b>
<b>IHBG funds:</b>		
<b>Funds from other Sources:</b>		

SECTION 7: INDIAN HOUSING PLAN CERTIFICATION OF COMPLIANCE (NAHASDA § 102(b)(2)(D))

By signing the IHP, you certify that you have all required policies and procedures in place in order to operate any planned IHBG programs.

(1) In accordance with applicable statutes, the recipient certifies that it will comply with title II of the Civil Rights Act of 1968 in carrying out this Act, to the extent that such title is applicable, and other applicable federal statutes.

Yes [X] No [ ]

(2) To be eligible for minimum funding in accordance with 24 CFR 1000.328, the recipient receiving less than \$200,000 under FCAS certifies that there are households within its jurisdiction at or below 80 percent of median income.

Yes [ ] No [ ] Not Applicable [X]

(3) The following certifications will only apply where applicable based on program activities.

(a) The recipient will maintain adequate insurance coverage for housing units that are owned and operated or assisted with grant amounts provided under NAHASDA, in compliance with such requirements as may be established by HUD.

Yes [X] No [ ] Not Applicable [ ]

(b) Policies are in effect and are available for review by HUD and the public governing the eligibility, admission, and occupancy of families for housing assisted with grant amounts provided under NAHASDA.

Yes [X] No [ ] Not Applicable [ ]

(c) Policies are in effect and are available for review by HUD and the public governing rents charged, including the methods by which such rents or homebuyer payments are determined, for housing assisted with grant amounts provided under NAHASDA.

Yes [X] No [ ] Not Applicable [ ] and

(d) Policies are in effect and are available for review by HUD and the public governing the management and maintenance of housing assisted with grant amounts provided under NAHASDA.

Yes [X] No [ ] Not Applicable [ ]

SECTION 8: IHP TRIBAL CERTIFICATION (NAHASDA § 102(c))

This certification is used when a Tribally Designated Housing Entity (TDHE) prepares the IHP on behalf of a tribe. This certification must be executed by the recognized tribal government covered under the IHP.

- (1) The recognized tribal government of the grant beneficiary certifies that:
(2) [X] It had an opportunity to review the IHP and has authorized the submission of the IHP by the TDHE; or
(3) [ ] It has delegated to such TDHE the authority to submit an IHP and amendments on behalf of the Tribe without prior review by the Tribe.

Table with 2 columns: Field Number and Description, and Value. Rows include Recipient (Coquille Indian Tribe), Authorized Official's Name and Title (Brenda Meade, Chairperson), Authorized Official's Signature (Handwritten signature), and Date (07/13/2017).



COQUILLE INDIAN TRIBE

3050 Tremont Street North Bend, OR 97459 Phone: (541) 756-0904 Fax: (541) 756-0847 www.coquilletribe.org

RESOLUTION CY17079

FISCAL YEAR 2018 INDIAN HOUSING PLAN

WHEREAS, the Coquille Indian Tribe is governed by the Coquille Tribal Council pursuant to the Tribal Constitution adopted by eligible voters of the Tribe on August 27, 1991, and approved by the Secretary of the Interior on September 9, 1991; and that the Tribal Council is empowered to act for the Coquille Indian Tribe; AND

WHEREAS, the Coquille Indian Tribe is a federally recognized Tribe by virtue of the Coquille Restoration Act and is eligible for federal services and benefits including housing and related programs under the Native American Housing Assistance and Self-Determination Act ("NAHASDA"); AND

WHEREAS, the Coquille Indian Tribe has established the Coquille Indian Housing Authority as its Tribally-Designated Housing Entity ("TDHE"); AND

WHEREAS, the Housing Authority Board of Commissioners and staff have developed an Indian Housing Plan for the Fiscal Year 2018 as required by NAHASDA; AND

WHEREAS, the Housing Authority Board of Commissioners has presented the Fiscal Year 2018 Indian Housing Plan attached hereto as Exhibit A to the Coquille Tribal Council for review and approval; NOW

THEREFORE, BE IT RESOLVED, that the Tribal Council of the Coquille Indian Tribe hereby approves the Fiscal Year 2018 Indian Housing Plan for submission to the U.S. Department of Housing and Urban Development and requests that it be approved; AND

THEREFORE, BE IT FINALLY RESOLVED, that the Chairperson of the Tribal Council, or in the absence of the Chairperson the Vice-Chairperson, is hereby authorized to sign, execute, and negotiate all related applications, contracts, agreements, and amendments thereto on behalf of the Tribe.

CERTIFICATION

The foregoing Resolution was duly adopted at the Tribal Council Meeting held on the Coquille Indian Tribe Reservation in North Bend, Oregon, on July 13, 2017, with the required quorum present by a vote of

5 For; 0 Against; 1 Absent; 0 Abstaining.

Brenda Meade, Chairperson

Kippy Robbins, Acting Secretary-Treasurer



SECTION 9: TRIBAL WAGE RATE CERTIFICATION (NAHASDA §§ 102(b)(2)(D)(vi) and 104(b))

By signing the IHP, you certify whether you will use tribally determined wages, Davis-Bacon wages, or HUD determined wages. Check only the applicable box below.

- (1) [ ] You will use tribally determined wage rates when required for IHBG-assisted construction or maintenance activities. The Tribe has appropriate laws and regulations in place in order for it to determine and distribute prevailing wages.
(2) [X] You will use Davis-Bacon or HUD determined wage rates when required for IHBG-assisted construction or maintenance.
(3) [ ] You will use Davis-Bacon and/or HUD determined wage rates when required for IHBG-assisted construction except for the activities listed below.

(4) List the activities using tribally determined wage rates:

SECTION 10: SELF-MONITORING (NAHASDA § 403(b), 24 CFR § 1000.502)

(1) Do you have a procedure and/or policy for self-monitoring, including monitoring sub-recipients? Yes [X] No [ ]
(2) Pursuant to 24 CFR § 1000.502 (b) where the recipient is a TDHE, the grant beneficiary (Indian Tribe) is responsible for monitoring programmatic compliance. Did the Tribe monitor the TDHE? Yes [X] No [ ] Not Applicable [ ]
(3) Did you complete an annual compliance assessment? Yes [X] No [ ]

(4) Self-Monitoring Results (Describe the results of the monitoring activities, including inspections for this program year.):

Following is the full text of the Housing Authority's FY 2018 Self-Monitoring Assessment

October 19, 2018

Coquille Tribal Council North Bend, OR 97459

Coquille Indian Housing Authority Board of Commissioners Coos Bay, OR 97420

SELF-MONITORING REPORT

INTRODUCTION

An Annual Compliance Assessment of the Coquille Indian Housing Authority's (CIHA) Indian Housing Block Grant (IHBG) program was completed on October 19, 2018 covering the program year 2018. The assessment was conducted as required by the Coquille Indian Tribe's Self-Monitoring Policy adopted by Tribal Council Resolution CY0254 and in accordance with the requirements of the implementing regulations of the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA) found at 24 Code of Federal Regulations (CFR) Part 1000.502. JWILLIS INC. and CIHA staff utilized the HUD Office of Native American Programs Monitoring Plan checklists to complete the assessment. A new checklist was added to this year's assessment to evaluate the Authority's ongoing compliance with IRS requirements applicable to the tax-exempt bond financing obtained for the Projects and Maintenance Operations and Storage Facility.

An outside consultant from JWILLIS INC. conducted the assessment with the assistance of the following individuals, who currently serve as the Monitoring Committee:

- Anne Cook, Executive Director; Lyman Meade, Deputy Director; Debbie Dennis, Administrative Services Coordinator; Dale Herring, Housing Programs Coordinator; Tracey Mueller, Housing Programs Specialist; Marcy Chytka, Accounting Services Coordinator; Scott Felton, Maintenance Coordinator; Scott Platter, Maintenance Technician

Areas Reviewed:

- 1. APR and IHP; 2. Organization and Structure; 3. Environmental Review; 4. Other Programs - Warehouse Project; 5. Financial and Fiscal Management; 6. Procurement and Contract Administration; 7. Labor Standards; 8. Relocation and Real Property Acquisition; 9. Lead-Based Paint; 10. Section 504 Accessibility; 11. Maintenance and Inspection; 12. IHBG Self-Monitoring; 13. Admissions and Occupancy; 14. Subrecipient Agreements

The Monitoring Committee and reviewer chose to classify review results in three ways:

- 1. Recommendations - Suggested improvements to existing procedures which are not deficiencies, but which could assist management and staff in improving the performance of the organization.
2. Concerns - Deficiencies in performance but not violations of statutory or regulatory requirements. Recommendations are provided for correcting any areas of concern.
3. Findings - Clear violations of statutory or regulatory requirements. Findings require corrective action.

**ASSESSMENT RESULTS**

**1. APR and IHP**

Deputy Director Lyman Meade interviewed Anne Cook, Executive Director, to review the Authority's IHP and APR compliance. He also reviewed the files and documents which addressed this area. No recommendations, concerns, or findings were noted in this area.

**2. Organization and Structure**

Deputy Director Lyman Meade interviewed Anne Cook, Executive Director, to review the organization and administration of the programs. He also reviewed the Authority's files and documents which addressed this area. No concerns or findings were noted in this area, but the following management improvement is suggested:

**Recommendation**

**Authority's Policies Could Be Improved**

The Authority's policies are re-examined each year against any new statutory and procedural requirements to ensure they are compliant with current HUD rules and regulations. In all areas addressed by this self-monitoring assessment it was noted that its policies and procedures address the Authority's obligation to comply with NAHASDA rules and regulations.

While, as noted above, its existing policies and procedures comply with statutory requirements, the Authority is encouraged to continue updating and improving its policies during the upcoming year.

**3. Environmental Review**

Deputy Director Lyman Meade interviewed Anne Cook, Executive Director, to review the Authority's environmental review compliance. He examined the Authority's environmental review records which addressed all applicable areas requiring environmental review.

No recommendations, concerns, or findings were noted in this area.

**4. Other Programs – Warehouse Project**

The Consultant interviewed Anne Cook, Executive Director, to review the status of the Authority's warehouse project.

As stated in the prior year's report, this project required an exceptional amount of preplanning to ensure that it fulfilled its intended purpose. The warehouse was completed in December and its tenants, both the Tribe and the Housing Authority, have found its innovative design to be both practical and attractive for its users. The Consultant commends the Tribe and Authority on the success of this project. Both should take great pride for such a remarkable achievement.

**5. Financial and Fiscal Management**

Maintenance Coordinator Scott Felton and Deputy Director Lyman Meade interviewed Marcy Chytka, Accounting Services Coordinator, to determine present procedures

Tests were conducted and documents were reviewed to determine present procedures and compliance with standards for financial reporting, maintaining accounting records, cash management, allowable costs, insurance, internal controls, separation of duties, and tax-exempt bond compliance.

Mr. Felton noted that the Consultant, in performing monthly readings of the financial statements, reported no adverse comments concerning their accuracy and the most recent annual financial audit reported no findings. Mr. Felton and Mr. Meade found no exceptions in their tests of the financial management systems.

No concerns or findings were noted in this area.

### **Recommendations**

#### **Allocation of Payroll Expenses**

With the completion of the warehouse, the Authority returned to the payroll allocation levels used prior to the project. It is recommended that a new time study be performed to ensure these percentages accurately reflect the Authority's current distribution of effort.

#### **Requirement to Calculate Program Income on the Cash Basis**

The FY 2012 Self-Monitoring Report noted that HUD requires that the cash basis method be used in calculating program income for 1937 Housing Act rental units. The Authority calculates its program income allocation on the accrual basis rather than the cash basis. Because of the excellent record the Authority has with collection of its receivables each month, the difference between these two amounts for purposes of computing program income is not material. The Accounting Services Coordinator is aware of this requirement and continues to monitor this area for significant changes. Accounting for this area will be converted to the cash basis if tenant receivable balances warrant such a change.

### **6. Procurement and Contract Administration**

Housing Programs Coordinator Dale Herring interviewed Debbie Dennis, Administrative Services Coordinator, to determine present procedures. It was noted that the Authority's outside auditors also review this area during the annual financial audit. Mr. Herring tested all procurements over \$5,000 to determine if proper procedures were used for expenditures in excess of the Authority's micro purchase policy.

These tests revealed that all procurements over this threshold were properly documented and followed the solicitation method required by the Authority in all instances. In addition, based on the reviewer's tests of those purchases made within the micro purchase policy, it was evident that the Authority attempted to purchase from multiple sources to achieve competitive pricing of products. The Authority should be commended on this practice as it reflects the realization that the \$5,000 requirement is mandated, but the conscientious practice of getting the best price for the Authority's funds is the real goal.

There were no contracts or purchases that exceeded the small purchase threshold in the period.

No concerns, findings, or recommendations were noted in this area.

### **7. Labor Standards and Construction Management**

Housing Services Coordinator Dale Herring interviewed Debbie Dennis, Administrative Services Coordinator, to determine present procedures. The Authority uses HUD-determined or Davis-Bacon wage rates as dictated by the type of work. Mr. Herring reviewed certified payrolls where required by the type of work to substantiate that the Authority was following required procedures in this area. These were tested to ensure compliance with Davis-Bacon requirements. No exceptions were noted in this review.

No recommendations, concerns, or findings were noted in this area.

**8. Relocation and Real Property Acquisition**

No activity occurred during the period.

**9. Lead-Based Paint**

Maintenance Technician Scott Platter interviewed Dale Herring, Housing Programs Coordinator, to determine present procedures. The units of all participants in the Monthly Housing Assistance Payments (MHAP) tenant-based rental assistance program that have children under the age of six in the household and live in homes built before 1978 require testing for lead-based paint issues. One unit required lead-based paint testing during the period, was inspected by a qualified inspector, and passed inspection.

No recommendations, concerns, or findings were noted in this area.

**10. Section 504 Accessibility**

In prior self-monitoring engagements, it was noted that the Authority has compliance issues with respect to its conformity with Section 504 accessibility rules. A legal review revealed that in the initial construction of the reservation units in the 1990s, the Authority did not build the number of Section 504 compliant units to meet the requirements of this statute.

The Authority has three compliant units (the number required by regulation), two of which are rented and one of which is leased under a lease-purchase contract. Although the Authority is in technical compliance with 504 rules, it is the Authority's intent to continue to work toward providing at least one additional 504-compliant rental unit as funds become available or appropriate units become vacant that can be rehabilitated into 504-compliant unit(s).

In the interim, in accordance with 24 CFR 8.4 (b) (1), other actions will be taken to ensure residents with needs under the Act receive specific modifications to their units as necessary.

**11. Maintenance and Inspection**

Housing Programs Technician Tracey Mueller interviewed Debbie Dennis, Administrative Services Coordinator and Scott Platter, Maintenance Technician.

Files were randomly selected for review to determine if annual inspections had been conducted on all rental and homebuyer units as required, and if annual preventive maintenance (APM) was occurring on all rental units. All units selected had been inspected at least once in the previous year and annual preventive maintenance work had been completed or scheduled. The forms used for these inspections are thorough and provide accurate information for work orders to be issued, when necessary.

Work orders were randomly selected for review to determine if work requested was completed. The list of open work orders was reviewed; there were minimal work orders open at the time. Maintenance staff were focused on exterior APM work while weather allowed and preparing vacant units for re-occupancy.

The computerized tracking of work orders, inspections, and preventive maintenance helps to ensure that timely maintenance of units occurs to maintain the integrity of the units. The system has promoted efficient use of resources, quick responses to resident's requests for service and repairs, and overall improved maintenance of the physical units.

It was noted that maintenance of the Authority's vehicles, common areas, and other buildings and facilities were tracked using the system as well.

No recommendations, concerns, or findings were noted in this area.

**12. IHBG Self-Monitoring**

The Consultant interviewed Anne Cook, Executive Director, to review the Authority's self-monitoring program. Five years ago, HUD monitored the Authority's self-monitoring program and noted that the program was exemplary. The comprehensive approach taken by the Authority continues to address all areas of compliance mandated by HUD and as necessitated by other program activities.

No recommendations, concerns, or findings were noted in this area.

**13. Admissions and Occupancy**

Maintenance Technician Scott Platter interviewed Dale Herring, Housing Programs Coordinator, to determine present procedures. During the most recent financial audit, the Authority's outside auditors examined at least 1/3 of the files from each category and found no exceptions; therefore, additional testing was limited in this area. Ten random files were tested and found to be in compliance with no exceptions.

No concerns or findings were noted in this area, but the following management improvement is suggested:

**Recommendation**

**Interest Should Be Charged on Payback Agreements**

While provision is made in policy for the addition of interest to payback agreements, this has not been interpreted into practice. It is recommended that the Authority implement this provision of its policy to offset the costs of offering this option to participants.

**14. Subrecipient Agreements**

The Authority has no subrecipient agreements.

**CONCLUSION**

The Consultant and Monitoring Committee concur that the IHBG program is well managed and substantially in compliance with the requirements of NAHASDA. There is one item of special interest that should be noted. The Authority has continued to exert exemplary control over resident receivables. In the current fiscal year, the increase in Tenant Accounts Receivable (TARs) was 4%, which, although higher than the Authority's usual rate, remains a significant accomplishment in subsidized housing.

It is suggested that CIHA consider any recommended improvements provided by the Consultant and the Committee for possible implementation. The Consultant and the Committee thank all those that participated for their cooperation and assistance in completing the annual compliance assessment.

Respectfully submitted,

**JWILLIS INC. and the Monitoring Committee**

**SECTION 11: INSPECTIONS**  
NAHASDA § 403(b)

(1) **Inspection of Units** (Use the table below to record the results of the inspections of assisted housing.)

Results of Inspections						
(A) Activity		(B) Total number of units (Inventory)	(C) Units in standard condition	(D) Units needing rehabilitation	(E) Units needing to be replaced	(F) Total number of units inspected
1.	<b>1937 Housing Act Units:</b>					
	a. Rental	50	50	0	0	50
	b. Homeownership	7	7	0	0	7
	c. Other – Section 8	19	19	0	0	19
<b>1937 Act Subtotal</b>		<b>76</b>	<b>76</b>	<b>0</b>	<b>0</b>	<b>76</b>
2.	<b>NAHASDA Units:</b>					
	a. Rental	2	2	0	0	2
	b. Homeownership	4	4	0	0	4
	c. Rental Assistance	41	41	0	0	41
	d. Other	0	0	0	0	0
<b>NAHASDA Subtotal</b>		<b>47</b>	<b>47</b>	<b>0</b>	<b>0</b>	<b>47</b>
<b>Total</b>		<b>123</b>	<b>123</b>	<b>0</b>	<b>0</b>	<b>123</b>

**Note:** Total of column F should equal the sum of columns C+D+E.

(2) Did you comply with your inspection policy: Yes  No

(3) If no, why not:

**SECTION 12: AUDITS**  
24 CFR §§ 1000.544 and 548

This section is used to indicate whether an Office of Management and Budget (OMB) Circular A-133 audit is required, based on a review of your financial records.

Did you expend \$500,000 or more in total Federal awards during the previous fiscal year ended?

Yes  No

If Yes, an audit is required to be submitted to the Federal Audit Clearinghouse and your Area Office of Native American Programs. If No, an audit is not required.

SECTION 13: PUBLIC AVAILABILITY

NAHASDA § 408, 24 CFR § 1000.518

(1) Did you make this APR available to the citizens in your jurisdiction before it was submitted to HUD (24 CFR § 1000.518)?

Yes [X] No [ ]

(2) If you are a TDHE, did you submit this APR to the Tribe (24 CFR § 1000.512)?

Yes [X] No [ ] Not Applicable [ ]

(3) If you answered "No" to question #1 and/or #2, provide an explanation as to why not and indicate when you will do so.

(4) Summarize any comments received from the Tribe and/or the citizens (NAHASDA § 404(d)):

SECTION 14: JOBS SUPPORTED BY NAHASDA

(NAHASDA § 403(b))

Use the table below to record the number of jobs supported with IHBG funds each year.

Table with 2 columns: Job Type, Number of Jobs Supported. Rows include Permanent Jobs (9) and Temporary Jobs (0).



Coquille Indian Housing Authority  
Projects and Maintenance Operations and Storage Facility

Open House  
June 23, 2018





**Coquille Indian Housing Authority**  
2678 Mexeye Loop Coos Bay, OR 97420  
(541) 888-6501 [www.coquilleiha.org](http://www.coquilleiha.org)

