

October 29, 2020

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 October 5-16, 2020 covering the program year 2020. 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. The CIHA Board of Commissioners, Executive Director, and staff utilized the HUD Office of Native American Programs Monitoring Plan checklists to complete the assessment.

Monitoring Committee:

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| Paul Doyle, Chairperson | Lyman Meade, Deputy Director |
| Robert More, Secretary/Treasurer | Debbie Dennis, Administrative Services Coordinator |
| Don Garrett, Commissioner | Marcy Chytka, Controller |
| Judy Rocha, Commissioner | Dale Herring, Housing Programs Coordinator |
| Anne Cook, Executive Director | Tracey Mueller, Housing Programs Specialist |

Areas Reviewed:

1. APR and IHP
2. Organization and Structure
3. Environmental Review
4. Financial and Fiscal Management
5. Procurement and Contract Administration
6. Labor Standards
7. Lead-Based Paint
8. Section 504 Accessibility
9. Maintenance and Inspection
10. IHBG Self-Monitoring
11. Admissions and Occupancy
12. Tax-Exempt Bond Compliance

The Monitoring Committee 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

Chairperson Paul Doyle and Commissioner Judy Rocha interviewed Anne Cook, Executive Director, to review the Authority's IHP and APR compliance. Chairperson Doyle and Commissioner Rocha also examined files and documents which addressed this area.

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

2. Organization and Structure

Chairperson Paul Doyle and Commissioner Judy Rocha interviewed Anne Cook, Executive Director, to review the organization and administration of the programs. Chairperson Doyle and Commissioner Rocha also reviewed the Authority's files and documents which addressed this area.

No concerns or findings were noted, but the following observations were made:

Recommendations

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. However, although its existing policies and procedures comply with statutory requirements, the Authority is encouraged to update and clarify some areas of its Admissions and Occupancy, Financial Management, and Personnel policies.

Reconsider County PILOT LCA

The Authority may wish to transition its current local cooperative agreement arrangements to the County.

3. Environmental Review

Chairperson Paul Doyle and Commissioner Judy Rocha interviewed Anne Cook, Executive Director, regarding the Authority's environmental review compliance and examined the Authority's environmental review records. All activities were addressed as required and reviews completed prior to the expenditure of funds.

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

4. Financial and Fiscal Management

Chairperson Paul Doyle and Secretary/Treasurer Robert More interviewed Marcy Chytka, Controller, to determine present procedures.

Reviewers selected random computer-generated samples, conducted tests, and reviewed documents to determine compliance with applicable standards for financial reporting, maintaining accounting records, cash management, allowable costs, insurance, internal controls, separation of duties, and tax-exempt bond compliance. The Reviewers noted that the most recent annual financial audit reported no findings. No exceptions were found in the reviewers' tests of the financial management systems.

No concerns or findings were noted in this area, but the following recommendation was noted:

Recommendation

Requirement to Calculate Program Income on the Cash Basis

The FY 2012 Self-Monitoring Report noted that HUD requires 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 tenant rents each month, the difference between these two amounts for purposes of computing program income is not material. The Controller 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.

5. Procurement and Contract Administration

Chairperson Paul Doyle and Commissioner Don Garrett interviewed Debbie Dennis, Administrative Services Coordinator, to determine present procedures. It was noted that the outside auditors also review this area during their annual audit engagement. Chairperson Doyle and Commissioner Garrett tested all procurements over \$10,000 to determine if proper procedures were used for expenditures in excess of the Authority's micro-purchase policy.

Tests revealed that all procurements over this threshold were properly documented and followed the solicitation method required by the Authority policy in all instances. In addition, based on the Reviewers' 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 \$10,000 requirement is mandated, but the conscientious practice of getting the best price for the Authority's funds is the real goal.

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

6. Labor Standards

Chairperson Paul Doyle and Commissioner Don Garrett 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. Chairperson Doyle and Commissioner Garrett reviewed all certified payrolls, where required by the type of work, to substantiate that the Authority was following proper procedures and to ensure compliance with Davis-Bacon standards. No exceptions were observed.

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

7. Lead-Based Paint

Chairperson Paul Doyle and Secretary/Treasurer Robert More interviewed Tracey Mueller, Housing Programs Specialist, to determine and verify present procedures. The units of all participants in the Monthly Housing Assistance Payments (MHAP) tenant-based rental assistance program with children under the age of six in the household living in homes built before 1978 require testing for lead-based paint issues by a qualified inspector. Four units required lead-based paint testing during the period, three of which passed inspection the first time. The fourth unit failed and the landlord chose not to perform abatement.

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

8. 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.

During the current self-monitoring review, it was determined that the Authority is in technical compliance with the rules. 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 additional 504 compliant rental units. On December 4, 2019, the Authority was awarded an IHBG Competitive grant for the purpose of rehabilitating three existing rental units to Section 504 standards and constructing three new Section 504 rental units. The project was postponed to FY 2021 due to the COVID-19 pandemic. 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.

9. Maintenance and Inspection

Commissioner Don Garrett interviewed Lyman Meade, Deputy Director.

Commissioner Garrett noted that non-essential inspections, annual preventive maintenance, and work orders were suspended due to the COVID-19 pandemic. Emergency maintenance, repairs, and appliance replacements occurred, as needed. Non-essential work will resume when safe for residents and staff.

The computerized tracking of work orders, inspections, and preventive maintenance continues to help ensure the timely maintenance of units occurs. The system has promoted efficient use of resources, quick response to resident requests for service and repairs, and overall improved maintenance of the physical units.

No concerns or findings were noted in this area, but the following recommendation was noted:

Recommendation

Increase Staffing

The Reviewer suggested the Authority hire staff to perform cleaning, grounds-keeping, and other services currently performed by contractors.

10. IHBG Self-Monitoring

Chairperson Paul Doyle and Commissioner Judy Rocha interviewed Anne Cook, Executive Director, and reviewed documents related to the Authority's self-monitoring program. In the last HUD monitoring report, it was noted that the Authority's self-monitoring 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.

11. Admissions and Occupancy

Chairperson Paul Doyle and Secretary/Treasurer Robert More interviewed Dale Herring, Housing Programs Coordinator, to determine present procedures. The Authority's

outside auditors examined multiple files from each category and their testing found no exceptions, therefore the Reviewers felt that additional testing could be limited in this area. Seven files were tested from a random computer-generated sample and found to be in compliance with no exceptions.

No concerns, or findings were noted in this area.

Recommendation

Self-Monitoring Assessment Information Gathering Could be More Efficient

Progress has been made in this area during the period. However, information gathering for future self-monitoring assessments could be streamlined further by filing national and area income limits current at the time of application in the section of the client's file with the original application.

12. Tax-Exempt Bond Compliance

Chairperson Paul Doyle and Secretary/Treasurer Robert More interviewed Marcy Chytka, Controller, and reviewed records to determine compliance with bond documents and IRS requirements.

No recommendations, concerns or findings were noted.

CONCLUSION

The Monitoring Committee concur that the IHBG program is well-managed and substantially in compliance with the requirements of NAHASDA. One special item that should be noted is the Authority's excellent control over resident receivables. The Authority's Tenant Accounts Receivable (TARs) rate of .06% during this economically challenging time is an exemplary accomplishment.

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

Respectfully submitted,

Monitoring Committee