

November 9, 2021

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 performed October 12-21, 2021 covering the program year 2021. 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:

Paul Doyle, Chairperson	Anne Cook, Executive Director
Robert More, Secretary/Treasurer	Debbie Dennis, Administrative Services Coordinator
Don Garrett, Commissioner	Marcy Chytka, Controller
Judy Rocha, Commissioner	Scott Felton, Maintenance Coordinator
	Tracey Mueller, Housing Programs Coordinator

Areas Reviewed:

- | | |
|--------------------------------------------|-------------------------------------------------------|
| 1. APR and IHP | 8. Section 504 Accessibility |
| 2. Organization and Structure | 9. Maintenance and Inspection |
| 3. Environmental Review | 10. IHBG Self-Monitoring |
| 4. Financial and Fiscal Management | 11. Admissions and Occupancy |
| 5. Procurement and Contract Administration | 12. Tax-Exempt Bond Compliance |
| 6. Labor Standards | 13. U.S. Treasury Emergency Rental Assistance Program |
| 7. Lead-Based Paint | |

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. IHP and APR

Chairperson Paul Doyle and Commissioner Judy Rocha interviewed Executive Director Anne Cook to assess 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.

2. Organization and Structure

Chairperson Paul Doyle and Commissioner Judy Rocha interviewed Executive Director Anne Cook 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.

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 policy and to review its Conflict of Interest policies, procedures, and records for consistency.

Reconsider County PILOT LCA

When time allows, the Authority may wish to renew efforts to transition its current local cooperative agreement arrangements to the County.

3. Environmental Review

Chairperson Paul Doyle and Commissioner Judy Rocha interviewed Executive Director Anne Cook 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.

4. Financial and Fiscal Management

Chairperson Paul Doyle and Secretary/Treasurer Robert More interviewed Controller Marcy Chytka 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, and separation of duties. 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.

Recommendations

Self-Monitoring Process Could be More Efficient

Prior to the next Self-Monitoring Assessment, the Authority is encouraged to obtain audit programs and workpapers to potentially reduce the scope of testing as per the Financial and Fiscal Management Monitoring Plan checklist page 3, item 2 *Audit Working Papers*.

It was noted that it would save time to differentiate between multiple household members who make payments for the same unit on the same day by adding a first initial in the description of the payment when posting in the accounting software.

The Reviewers also recommend that the Monitoring Plan checklists be converted to fillable forms if possible.

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 Administrative Services Coordinator Debbie Dennis to determine present procedures. 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.

6. Labor Standards

Chairperson Paul Doyle and Commissioner Don Garrett interviewed Administrative Services Coordinator Debbie Dennis and reviewed documents to determine the Authority's compliance with Federal Labor Standards. During the period, HUD's Office of Davis-Bacon & Labor Standards performed a remote compliance monitoring. The Authority's overall performance was satisfactory, however one finding required corrective action. Although employee interviews had been conducted and the necessary information gathered and documented, in some instances it had not been recorded on the proper form or in the format required by HUD. The Authority completed corrective action within the time allotted and received a final closeout letter on April 5, 2021.

No recommendations, concerns, or findings were noted.

7. Lead-Based Paint

Chairperson Paul Doyle, Secretary/Treasurer Robert More, and Commissioner Judy Rocha interviewed Housing Programs Coordinator Tracey Mueller to determine and verify present procedures. When a Monthly Housing Assistance Program (MHAP) tenant-based rental assistance applicant has children under the age of six in the household and wishes to reside in a home built before 1978, the home must be tested for lead-based paint issues by a qualified inspector. During the period, two units required testing. One passed inspection the first time. The other failed and the landlord agreed to perform the necessary abatement. However, the family became ineligible (over income) before re-inspection occurred.

No recommendations, concerns, or findings were noted.

8. Section 504 Accessibility

Commissioner Don Garrett interviewed Maintenance Coordinator Scott Felton.

In prior self-monitoring engagements, it was noted that the Authority has had 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 units necessary to meet the requirements of this statute.

At present, the Authority has three fully 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 meets the minimum compliance threshold, it is the Authority's intent to continue to work toward providing additional 504 compliant units.

In FY 2020, 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. Plans to begin work in FY 2021 were postponed to FY 2022 due to staffing shortages, contract labor and material shortages and cost increases, and additional workload created by COVID-related programs and funding.

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 Maintenance Coordinator Scott Felton.

Commissioner Garrett noted that interior inspections and non-essential work orders had been suspended during the period due to the COVID-19 pandemic and will resume when determined safe. Emergency interior maintenance, repairs, and appliance replacements occurred as needed. Exterior preventive maintenance and preparation for reoccupancy were performed by staff and contractors. The turnaround time for one unit damaged by a kitchen fire was delayed due contractor and material availability.

The computerized tracking of work orders, inspections, and preventive maintenance continues to help ensure that timely maintenance occurs. The system has promoted efficient use of resources, quick responses to requests for service and repairs, and overall improved maintenance of the Authority's properties.

No recommendations, concerns, or findings were noted.

10. IHBG Self-Monitoring

Chairperson Paul Doyle and Commissioner Judy Rocha interviewed Executive Director Anne Cook 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.

11. Admissions and Occupancy

Chairperson Paul Doyle, Secretary/Treasurer Robert More, and Commissioner Judy Rocha interviewed Housing Programs Coordinator Tracey Mueller to determine present procedures. Twenty participant files were evaluated from a random computer-generated sample and found in compliance in all areas with no exceptions.

No concerns or findings were noted.

Recommendation

Self-Monitoring Assessment Could Be More Efficient

Progress has been made in this area during the period. However, the transition to electronic records has made it more time consuming to review the files of long-term tenants. Information gathering for future self-monitoring assessments could be streamlined by restoring original eligibility paperwork for long-term residents to their active files.

12. Tax-Exempt Bond Compliance

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

No recommendations, concerns, or findings were noted.

13. Emergency Rental Assistance Program

Chairperson Paul Doyle, Secretary/Treasurer Robert More, and Commissioner Judy Rocha interviewed Administrative Services Coordinator Debbie Dennis to determine present procedures and compliance with U.S. Treasury Emergency Rental Assistance (ERA) Program guidance, CIHA policy, and other applicable requirements. Checklists were created to monitor eligibility, privacy requirements, use and management of funds, administrative costs, and reporting. No exceptions were found.

No concerns or findings were noted.

Recommendations

ERA Files Could be Reorganized to Facilitate Access

ERA participant files could be reorganized to make Self-Monitoring information gathering more efficient.

Authority's ERA Policy Could Be Revised

The Authority's policy could be revised to provide acceptable alternatives to a formal rental lease as provided in the Frequently Asked Questions published by the Treasury on August 25, 2021.

CONCLUSION

The Monitoring Committee concur that the IHBG program is well managed and substantially in compliance with the requirements of NAHASDA. Of special note is the Authority's success with the U.S. Department of the Treasury Emergency Rental Assistance Program. The Authority assisted 145 renter households and reached an expenditure/obligation rate of 66% during the last six months of FY 2021, both of which are significant accomplishments. Also, the Authority continues to maintain a commendable TARs rate, which was 4.5% for the FY 2021 period.

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