

Anne Cook

From: Stitt, Sheila R <Sheila.R.Stitt@hud.gov>
Sent: Monday, February 14, 2022 11:18 AM
To: annecook@coquilleiha.org
Subject: Indian Housing Block Grant (IHBG) Formula for Name of the Tribe
Attachments: 22 Coquille 8800-O (FCAS Appeal).pdf; 22 Coquille 8746-O (TE and FCAS) 8-10-2021.docx; 20 Coquille 8477-O (FCAS) 9-23-2019.docx; 16 Coquille 6628-O (TE FCAS and FA Agreement) 10-27-2015.docx; 14 Coquille 5646-O (TE FA Agreement and FCAS corr) 9-17-2013.docx

Dear Ms. Cook:

You are receiving this email regarding Coquille Indian Tribe's Formula Current Assisted Stock (FCAS) concerning the Indian Housing Block Grant (IHBG) program. In response to changes resulting from COVID-19 safety protocols, HUD's Office of Native American Programs temporarily will be responding to IHBG formula correspondence by email. A hard copy of the document will not be sent. Please see the attached document responding to your concerns.

Should you have additional questions, please direct them to the IHBG Formula Customer Service Center at:

2614 Chapel Lake Drive
Gambrills, MD 21054
Phone: 800-410-8808
Fax: 202-393-6411
E-Mail: IHBGformula@firstpic.org

Thank you,

*Sheila Stitt
Office of Native American Programs
U.S. Department of Housing and Urban Development
451 7th Street, SW (Rm. 4108)
Washington, DC 20410
(Phone) (202) 402-6423*

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U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

February 14, 2022

SENT VIA ELECTRONIC MAIL

Ms. Anne Cook
Executive Director
Coquille Indian Housing Authority
2678 Mexeye Loop
Coos Bay, OR 97420

Dear Ms. Cook:

This is in response to your letter of September 1, 2021, November 30, 2021, and December 10, 2021, appealing the determinations made by HUD in its letter of September 17, 2013, October 27, 2015, September 23, 2019, and August 10, 2021 (copies enclosed) concerning the Coquille Indian Tribe's Formula Current Assisted Stock (FCAS) under the Indian Housing Block Grant (IHBG) program. Your request is made pursuant to 24 CFR § 1000.336.

Background

In your correspondence of July 30, 2013, you reported that units 2615 Mexeye and 2633 Mexeye in Mutual Help (MH) project OR97B038002 conveyed in Fiscal Year (FY) 2013. HUD's letter of September 17, 2013, removed these units from project OR97B038002 beginning in FY 2014. In your correspondence of July 29, 2015, you reported that unit 2674 Mexeye in project OR97B038002 conveyed in FY 2015. HUD's letter of October 27, 2015, removed this unit from project OR97B038002 beginning in FY 2016.

In your correspondence of August 26, 2019, you provided a full listing of all units in project OR97B038001 and OR97B038002 listing unit 709 Jis-Ta-Jia in project OR97B038001 as an eligible unit. HUD's letter of September 23, 2019, counted the units provided in your correspondence of August 26, 2019, as eligible units to match the Tribe's records.

In your correspondence of July 16, 2021, you reported that unit 2611 Mexeye in project OR97B038001 will convert back to a dwelling unit on October 1, 2021, and that after the conversion there are a total of 52 Low Rent (LR) units in project OR97B038001. However, HUD's records indicated that there were only 51 LR units in project OR97B038001. In HUD's letter of August 10, 2021, this unit remained ineligible and no changes were made to this project since you did not provide a copy of an Annual Contributions Contract (ACC) verifying the original type and number of units authorized to be developed under project OR97B038001.

Your correspondences of September 1, 2021, November 30, 2021, and December 10, 2021, submitted information appealing the decisions made in HUD's letters of September 17, 2013, October 27, 2015, September 23, 2019, and August 10, 2021, as follows.

Response to HUD’s Letters of September 17, 2013, October 27, 2015, September 23, 2019, and August 10, 2021

In your appeal of September 1, 2021, you provided a full listing of the 51 units in project OR97B038001 and the 20 units in project OR97B038002.

Incorrect Project Number

Your correspondence of September 1, 2021, stated that units 2615 Mexeye, 2633 Mexeye, and 2674 Mexeye were previously reported and removed from the incorrect project as shown below:

Table 1: Units Previously Removed as Conveyed			
Unit #	Incorrect Project #	Correct Project #	Unit Removed from FCAS
2615 Mexeye	OR97B038002 (MH)	OR97B038001 (LR)	FY 2014
2633 Mexeye	OR97B038002 (MH)	OR97B038001 (LR)	FY 2014
2674 Mexeye	OR97B038002 (MH)	OR97B038001 (LR)	FY 2016

In your correspondence of September 1, 2021, you stated that the correct project for unit 2615 Mexeye, 2633 Mexeye, and 2674 Mexeye is project OK97B038001, not project OR97B038002. Therefore, the Tribe’s FCAS will be adjusted as shown in Table 4 below. Please note that MH units are allocated less than LR units under the IHBG formula.

Unit Back into Service

Your correspondence of December 10, 2021, reported that one LR unit that was not being operated as low-income rental unit has changed status as follows:

Table 2: Converted Unit				
Project	# of Units	Unit #	Converted Date	Status
OR97B038001	1	2611 Mexeye	FY 2022	Converted Back to Dwelling Unit

In your correspondence of December 10, 2021, you reported that this unit converted back to a dwelling unit in FY 2022 with a move-in date of December 1, 2021. Therefore, this unit will be added back to the Tribe’s FCAS beginning in FY 2022, as shown in Table 4 below.

Ineligible Unit

Your correspondence of November 30, 2021, reported the status of one unit as follows:

Table 3: Change in the Unit Status			
Project	# of Units	Unit #	Status
OR97B038001	1	709 Jis-Ta-Jia	Non-FCAS Unit

In your correspondence of November 30, 2021, you stated that unit 709 Jis-Ta-Jia was built with Native American Housing and Self-Determination Act (NAHASDA) funds and that this unit was never part of the Tribe's FCAS. In accordance with 24 CFR § 1000.312, only units developed pursuant to an ACC are eligible as FCAS units. Therefore, this unit is ineligible as FCAS and unit 709 Jis-Ta-Jia will be removed from FCAS beginning in FY 2019, the fiscal year you reported this unit as an eligible unit as shown in Table 4 below.

FCAS Correction Summary

As a result of the information you have submitted, HUD is taking action to establish the Coquille Indian Tribe's FCAS for FY 2022 as follows:

Table 4: FCAS Correction Summary Table										
Project	FY 2014		FY 2015		FY 2016		FY 2017		FY 2018	
	Old	New	Old	New	Old	New	Old	New	Old	New
OR97B038001 (LR)	50	48	50	48	50	47	50	47	50	47
OR97B038002 (MH)	13	15	11	13	8	11	8	11	7	10
Difference	0		0		0		0		0	
Project	FY 2019		FY 2020		FY 2021		FY 2022			
	Old	New	Old	New	Old	New	Old	New		
OR97B038001 (LR)	50	46	51	47	51	47	51	48		
OR97B038002 (MH)	7	10	7	10	7	10	7	10		
Difference	-1		-1		-1		0			

Over/Under Funding Summary

In accordance with 24 CFR § 1000.319(d), HUD has three years from the date a Formula Response Form is sent out to question the eligibility of included units, which may result in recovery of over-paid amounts. The first action for units 2615 Mexeye and 2633 Mexeye in project OR97B038002 is HUD's letter of September 17, 2013, which corresponds to the FY 2012 Formula Response Form. The first action for unit 2674 Mexeye in project OR97B038002 is HUD's letter of October 27, 2015, which corresponds to the FY 2014 Formula Response Form. The first action for unit 709 Jis-Ta-Jia in project OR97B038001 is HUD's letter of September 23, 2019, which corresponds to the FY 2018 Formula Response Form. Therefore, the table above indicates that the Coquille Indian Tribe incorrectly received funding as follows:

Table 5: Incorrect Funding Received			
FY	# of Units Over-Counted	# of Units Under-Counted	Amount Over (-) or Under (+) Funded
FY 2014 (MH)	0	3	+\$11,012
FY 2014 (LR)	3	0	-\$19,231
FY 2015 (MH)	0	3	+\$11,282
FY 2015 (LR)	3	0	-\$19,518
FY 2016 (MH)	0	3	+\$11,570
FY 2016 (LR)	3	0	-\$20,018
FY 2017 (MH)	0	3	+\$11,922

FY 2017 (LR)	3	0	-\$20,603
FY 2018 (MH)	0	3	+\$11,918
FY 2018 (LR)	3	0	-\$20,630
FY 2019 (MH)	0	3	+\$12,412
FY 2019 (LR)	4	0	-\$28,810
FY 2020 (MH)	0	3	+\$12,782
FY 2020 (LR)	4	0	-\$29,970
FY 2021 (MH)	0	3	+\$13,547
FY 2021 (LR)	4	0	-\$32,964
Total Incorrect Funding Received (Over-funding)			-\$95,299

Determination

Based on new information submitted in your appeal, HUD has altered its decision in HUD's letters of September 17, 2013, October 27, 2015, September 23, 2019, and August 10, 2021. HUD will add three units that were incorrectly reported back to a MH project and remove those three units a LR project. HUD will also remove one unit beginning in FY 2019 from FCAS, and add one unit in FY 2022 to FCAS. The Tribe has been over-funded by \$95,299.

The Coquille Indian Tribe was erroneously granted a total of \$95,299 more than its proper formula allocations in FY 2014 through FY 2021. This reflects the \$191,744 in over-funding in FY 2014 through FY 2021 less the \$96,445 in under-funding in FY 2014 through FY 2021 addressed in Table 5 above.

Pursuant to Section 301 of the NAHASDA requiring proper formula allocations among the Tribes, and formula provisions 24 CFR § 1000.319 and 24 CFR § 1000.336, HUD is requiring that you remit the erroneously granted amount so that those funds can be reallocated amongst all the Tribes as required by the formula. HUD is proposing, as a method of remittance, that the Tribe's over-payment be collected from the Tribe's FY 2022 IHBG allocation in order to correct this matter.

Should you disagree with this decision, you may request reconsideration within 30 days of the date of receipt of this letter pursuant to 24 CFR § 1000.336(e)(2). If the Tribe does not seek reconsideration, this decision shall constitute a final agency action and the Tribe, within 30 days of the date of receipt of this letter, may either inform HUD that it authorizes deduction of the amount of the over-funding from your FY 2022 grant or submit a written proposal to repay by another means. If HUD does not hear from the Tribe within 30 days of the date of receipt of this letter, HUD will assume that it has authorized the deduction.

If you believe there was an error in processing or that the data is incorrect, you may submit additional documentation to support the unit(s) eligibility. Please refer to the Formula Response Form Appendices below for additional guidance on the documentation required for reporting discrepancies:

- Appendix A1 for units that are conveyance eligible or conveyed
- Appendix A2 for changes due to Date of Full Availability of FCAS units

- Appendix A3 for changes due to conversion of FCAS units
- Appendix A4 for demolished and rebuilt FCAS units
- Appendix A5 for all other FCAS changes

These can all be found at:

https://ihbgformula.com/PDF/FY_2021_Appendices_A_through_D.pdf

Your active participation ensures that allocations are fair and accurate. You will receive the Formula Response Form and subsequent Allocation and Formula Data form on an annual basis to help in your review and correction, as needed, of this important information.

If you have any questions, please contact the IHBG Formula Customer Service Center within 30 days of the date of this letter at:

2614 Chapel Lake Drive
Gambrills, MD 21054
Phone: 800-410-8808
Fax: 202-393-6411
E-Mail: IHBGformula@firstpic.org

Sincerely,



Heidi J. Frechette
Deputy Assistant Secretary
for Native American Programs

Enclosures



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

451 Seventh St, SW, Suite 5156
Washington, D.C. 20410

OFFICE OF PUBLIC AND INDIAN HOUSING

September 17, 2013

Ms. Anne Cook
Executive Director
Coquille Indian Housing Authority
2678 Mexeye Loop
Coos Bay, OR 97420

Dear Ms. Cook:

This is in response to your letter dated July 30, 2013, concerning the Tribal Enrollment, method for sharing Formula Area data, and Formula Current Assisted Stock (FCAS) as listed on the Coquille Tribe's Fiscal Year (FY) 2014 Indian Housing Block Grant (IHBG) Formula Response Form.

Tribal Enrollment

Your Tribal Enrollment figure of 985 has been accepted based upon documentation from your Tribal Member Service Coordinator dated July 2 2013, and your Tribe's IHBG formula data for FY 2014 will be updated from 964 to 985.

The impact of this change will be determined when we compute the FY 2014 formula allocation. The role of Tribal Enrollment in the IHBG formula is to cap Needs data, the number of American Indian and Alaska Native persons, at twice Tribal Enrollment.

Method of Sharing Formula Area

In your correspondence dated July 30, 2013, you stated that the Coquille Tribe has agreed to use Tribal Enrollment data instead of Total Resident Service Area Indian Population (TRSAIP) to determine each Tribe's share of the needs data under the IHBG program for the FY 2014 IHBG allocation. We also received requests to use Tribal Enrollment from all of the other Tribes that share Formula Area with your Tribe including:

- Confederated Tribes of Coos, Lower Umpqua and Siuslaw
- Confederated Tribes of the Grand Ronde Community of Oregon
- Cow Creek Band of Umpqua Indians
- Ft. Bidwell Tribe
- Karuk Tribe
- Klamath
- Quartz Valley Indian Reservation
- Siletz
- Smith River Rancheria
- Yurok Tribe

In accordance with 24 CFR 1000.326(b) and as agreed by all the involved Tribes, HUD will use Tribal Enrollment instead of TRSAIP data to allocate the needs data associated with those geographies listed in the table above for FY 2014. In addition, once the FY 2014 IHBG allocations are finalized, HUD will provide to all the involved Tribes a comparison of those Tribes' FY 2014 allocations as listed on their Final Allocation and Formula Data forms with that of what they would have received had the needs data been shared using TRSAIP data.

Furthermore, since the request is for FY 2014 only, HUD will allocate FY 2015 Needs based on TRSAIP unless all the involved Tribes agree to an alternative method for sharing the Needs data to HUD prior to FY 2015 Formula Response Form deadline.

Conveyance Eligible and Conveyed Mutual Help (MH) Units

Your office reported the conveyance of two MH units as follows:

Project	# of Units	Unit Numbers	FY	Status
OR97B038002	2	2615, 2633	2013	Conveyed

Units conveyed or eligible to be conveyed prior to October 1 of the calendar year immediately preceding the FY for which funds are provided are not eligible as FCAS beginning that FY unless the tribe can demonstrate that the unit has not been conveyed for reasons beyond its control.

Correction to FCAS

A review of our files indicated that our letter dated March 12, 2013, contained an error. In your correspondence dated October 30, 2013, your office reported the conveyance eligibility of units 2637 and 2652 in project OR97B038002 in FY 2012, and the conveyance of units 0013 and 0048 in project OR97B038002 in FY 2013. These units were removed in the FY following conveyance and conveyance eligibility. In your correspondence dated July 30, 2013, your office reported that your two ways in numbering units resulted in mistakenly reporting the conveyance of two of the same units. You noted that unit 2637 and 0013 are the same unit and unit 2652 and 0048 are the same unit.

Since conveyance of these units occurred in a timely fashion, units 2637/0013 and 2652/0048 were correctly removed from FCAS in FY2014, the year following their conveyance in 2013. Their removal in FY2013, based on conveyance eligibility, was incorrect.

As a result of the information you have submitted, HUD is taking action to establish the Coquille Tribe's FY 2014 FCAS as follows:

Project	FY 2013		FY 2014	
	Old	New	Old	New
OR97B038002	15	17	13	13
Difference		+2		0

Funding Adjustment Summary

As a result of the error in reporting, the Coquille Tribe was under-funded by two units in FY2 13 as shown in the table below. As a result the Tribe will receive a grant adjustment of \$7,253 in its FY 2014 grant.

Table 3: Funding Adjustment		
FY	# of Units	Funding Adjustment
FY 2013	2	\$7,253
Total Funding Adjustment		\$7,253

Thank you for submitting this correction. Your active participation ensures that allocations are fair and accurate. As you know, you will receive the Formula Response Form and subsequent Allocation and Formula Data form on an annual basis to help in your review and correction, as needed, of this important information.

Should you have any questions, please contact our IHBG Formula Customer Service Center at:

1025 Connecticut Avenue, NW, Suite 214
Washington, DC 20036
Phone: 800-410-8808
Fax: 202-393-6411
E-Mail: IHBGformula@firstpic.org

Sincerely,
/S/
Glenda N. Green
Director, Office of Grants Management

cc: Coquille Tribe



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

October 27, 2015

Ms. Anne Cook
Executive Director
Coquille Indian Housing Authority
2678 Mexeye Loop
Coos Bay, OR 97420

Dear Ms. Cook:

This is in response to your letter dated July 29, 2015, concerning the Tribal Enrollment, method for sharing Formula Area data, and Formula Current Assisted Stock (FCAS) as listed on the Coquille Tribe's Fiscal Year (FY) 2016 Indian Housing Block Grant (IHBG) Formula Response Form.

Tribal Enrollment

Your Tribal Enrollment figure of 1,030 has been accepted based upon documentation from your Tribal Member Service Coordinator dated July 27, 2015, and your Tribe's IHBG formula data for FY 2016 will be updated from 1,010 to 1,030.

The impact of this change will be determined when we compute the FY 2016 formula allocation. The role of Tribal Enrollment in the IHBG formula is to cap Needs data, the number of American Indian and Alaska Native persons, at twice Tribal Enrollment.

Method of Sharing Formula Area

In your correspondence dated July 29, 2015, you included a letter from the Tribe's Chairperson stating that the Coquille Tribe has agreed to use Tribal Enrollment data instead of Total Resident Service Area Indian Population (TRSAIP) to determine each Tribe's share of the needs data under the IHBG program for the FY 2016 IHBG allocation. We also received requests to use Tribal Enrollment from all of the other Tribes that share Formula Area with your Tribe including:

- Confederated Tribes of Coos, Lower Umpqua and Siuslaw
- Confederated Tribes of the Grand Ronde Community of Oregon
- Cow Creek Band of Umpqua Indians
- Ft. Bidwell Tribe
- Karuk Tribe
- Klamath
- Quartz Valley Indian Reservation
- Siletz
- Smith River Rancheria
- Yurok Tribe

In accordance with 24 CFR 1000.326(b) and as agreed by all the involved Tribes, HUD will use Tribal Enrollment instead of TRSAIP data to allocate the needs data associated with those geographies listed in the table above for FY 2016. In addition, once the FY 2016 IHBG allocations are finalized, HUD will provide to all the involved Tribes a comparison of those Tribes' FY 2016 allocations as listed on their Final Allocation and Formula Data forms with that of what they would have received had the needs data been shared using TRSAIP data.

Furthermore, since the request is for FY 2016 only, HUD will allocate FY 2017 Needs based on TRSAIP unless all the involved Tribes agree to an alternative method for sharing the Needs data to HUD prior to FY 2017 Formula Response Form deadline.

FCAS

Conveyed Mutual Help (MH) Units

Your office reported the conveyance of two MH units as follows:

Table 1: FCAS Conveyance Status				
Project	# of Units	Unit Numbers	FY	Status
OR97B038002	2	2604, 2674	2015	Conveyed

Units conveyed or eligible to be conveyed prior to October 1 of the calendar year immediately preceding the FY for which funds are provided are not eligible as FCAS beginning that FY unless the tribe can demonstrate that the unit has not been conveyed for reasons beyond its control.

As a result of the information you have submitted, HUD is taking action to establish the Coquille Tribe's FY 2016 FCAS as follows:

Table 2: FCAS Correction Summary by FY		
Project	FY 2016	
	Old	New
OR97B038002	11	9
Difference		-2

Thank you for submitting this correction. Your active participation ensures that allocations are fair and accurate. As you know, you will receive the Formula Response Form and subsequent Allocation and Formula Data form on an annual basis to help in your review and correction, as needed, of this important information.

Should you have any questions, please contact our IHBG Formula Customer Service Center at:

1025 Connecticut Avenue, NW, Suite 214
Washington, DC 20036
Phone: 800-410-8808
Fax: 202-393-6411
E-Mail: IHBGformula@firstpic.org

Sincerely,
/S/
Glenda N. Green
Director, Office of Grants Management

cc: Coquille Tribe



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

September 23, 2019

Ms. Anne Cook
Executive Director
Coquille Indian Housing Authority
2678 Mexeye Loop
Coos Bay, OR 97420

Dear Ms. Cook:

This is in response to your correspondence of July 26, 2019, and August 26, 2019, and a conversation with the Indian Housing Block Grant (IHBG) Formula Customer Service Center on August 28, 2019, concerning the Formula Current Assisted Stock (FCAS) as listed on the Coquille Indian Tribe's IHBG Formula Response Form for Fiscal Year (FY) 2020.

Information That Will be Addressed in a Separate Letter

Your correspondence of July 26, 2019, also provided information on the Tribe's Tribal Enrollment and method for sharing Formula Area data. This information will not be addressed in this letter, but will be addressed in a separate response.

Unit Counts

Your correspondence of August 26, 2019, provided a full listing of all units in projects OR97B038001 and OR97B038002. The Tribe's total unit counts for projects OR97B038001 and OR97B038002 match our records. However, based on the unit level information provided, the Tribe's count of units in each project differs with HUD's count of units. In addition, it appears that units were transferred from project OR97B038002 to project OR97B038001 over time. To match the Tribe's records going forward, we will count the following units as eligible units in projects OR97B038001 and OR97B038002 as shown in Table 1 below.

Table 1: Eligible Units	
Project	Unit
OR97B038001	706 Jis-Ta-Jia
OR97B038001	707 Jis-Ta-Jia
OR97B038001	710 Jis-Ta-Jia
OR97B038001	711 Jis-Ta-Jia
OR97B038001	2613 Mexeye
OR97B038001	2614 Mexeye
OR97B038001	2626 Mexeye
OR97B038001	2648 Mexeye
OR97B038001	502 Miluk Drive
OR97B038001	504 Miluk Drive

OR97B038001	506 Miluk Drive
OR97B038001	508 Miluk Drive
OR97B038001	510 Miluk Drive
OR97B038001	512 Miluk Drive
OR97B038001	514 Miluk Drive
OR97B038001	516 Miluk Drive
OR97B038001	518 Miluk Drive
OR97B038001	520 Miluk Drive
OR97B038001	704 Jis-Ta-Jia
OR97B038001	708 Jis-Ta-Jia
OR97B038001	709 Jis-Ta-Jia
OR97B038001	2603 Mexeye
OR97B038001	2605 Mexeye
OR97B038001	2607 Mexeye
OR97B038001	2608 Mexeye
OR97B038001	2609 Mexeye
OR97B038001	2616 Mexeye
OR97B038001	2617 Mexeye
OR97B038001	2620A Mexeye
OR97B038001	2620B Mexeye
OR97B038001	2620C Mexeye
OR97B038001	2620D Mexeye
OR97B038001	2624 Mexeye
OR97B038001	2627 Mexeye
OR97B038001	2628 Mexeye
OR97B038001	2629 Mexeye
OR97B038001	2631 Mexeye
OR97B038001	2636 Mexeye
OR97B038001	2638 Mexeye
OR97B038001	2639 Mexeye
OR97B038001	2640 Mexeye
OR97B038001	2646A Mexeye
OR97B038001	2646B Mexeye
OR97B038001	2646C Mexeye
OR97B038001	2646D Mexeye
OR97B038001	2650 Mexeye
OR97B038001	2651 Mexeye
OR97B038001	2670A Mexeye
OR97B038001	2670B Mexeye
OR97B038001	2670C Mexeye
OR97B038001	2670D Mexeye
OR97B038002	701 Jis-ta-Jia
OR97B038002	2601 Mexeye

OR97B038002	2618 Mexeye
OR97B038002	2625 Mexeye
OR97B038002	2634 Mexeye
OR97B038002	2658 Mexeye
OR97B038002	2659 Mexeye

In your correspondence of July 26, 2019, your office reported that unit 2608 in project OR97B038001 will convert back to an affordable housing unit on October 1, 2019. Therefore, one Low Rent (LR) unit will be added back to the Tribe's FCAS in FY 2020 as shown in Table 2 below. Your August 26, 2019, correspondence reported that unit 2608 was mistakenly reported under project OR97B038002 in your correspondence of July 26, 2016, letter. This unit is correctly added as a LR unit in project OR97B038001 as shown in Table 1 above.

FCAS Correction Summary

As a result of the information you have submitted, HUD is taking action to establish the Coquille Indian Tribe's FCAS for FY 2020 as follows:

Table 2: FCAS Correction Summary		
Project	FY 2020	
	Old	New
OR97B038001 (LR)	50	51
OR97B038002 (MH)	7	7
Difference		+1

Should you disagree with this decision, you have the right to file an appeal within 30 days of the date of this letter. HUD's policy is to afford tribes the same appeal rights afforded tribes who dispute data in accordance with 24 CFR § 1000.336(d).

Thank you for submitting these corrections. Your active participation ensures that allocations are fair and accurate. As you know, you will receive the Formula Response Form and subsequent Allocation and Formula Data form on an annual basis to help in your review and correction, as needed, of this important information.

Should you have any questions, please contact our IHBG Formula Customer Service Center at:

1875 Connecticut Avenue, NW, 10th Floor
Washington, DC 20009
Phone: 800-410-8808
Fax: 202-393-6411
E-Mail: IHBGformula@firstpic.org

Sincerely,

A handwritten signature in blue ink, appearing to read "Hi CU" followed by a horizontal line.

Hilary Atkin
Director, Office of Grants Management

cc: Coquille Indian Tribe



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

August 10, 2021

SENT VIA ELECTRONIC MAIL

Ms. Anne Cook
Executive Director
Coquille Indian Housing Authority
2678 Mexeye Loop
Coos Bay, OR 97420

Dear Ms. Cook:

This is in response to your correspondence of July 16, 2021, concerning the Tribal Enrollment and Formula Current Assisted Stock (FCAS) as listed on the Coquille Indian Tribe's Indian Housing Block Grant (IHBG) Formula Response Form for Fiscal Year (FY) 2022.

Tribal Enrollment

Your Tribal Enrollment figure 1,136 has been accepted based upon documentation from your Tribal Member Services Coordinator of July 15, 2021, and your Tribe's IHBG formula data for FY 2022 will be updated from 1,103 to 1,136.

The impact of this change will be determined when we compute the FY 2022 formula allocation. The role of Tribal Enrollment in the IHBG formula is to cap Needs data, the number of American Indian and Alaska Native persons, at twice Tribal Enrollment.

FCAS

In your correspondence of July 16, 2021, your office reported that unit 2611 in project OR97B038001 will convert back to a dwelling unit on October 1, 2021, and that after the conversion, there are a total of 52 Low Rent (LR) units in project OR97B038001. However, HUD's records indicated that there were only 51 LR units in project OR97B038001.

In accordance with the January 27, 1998, *Native American Housing Assistance and Self-Determination Act Transition Notice*, an Annual Contributions Contract (ACC) must be submitted to verify the original type and number of units authorized to be developed under this project. Since you did not provide a copy of an ACC of this project, no changes to this project will be made at this time.

If you believe that there are 52 units remaining in project OR97B038001, please submit an ACC for this project to the IHBG Formula Customer Service Center in accordance with the appeal procedures outlined below.

Should you disagree with this decision, you have the right to file an appeal within 30 days of the date of this letter. HUD affords Tribes the same appeal rights afforded Tribes who

dispute data in accordance with 24 CFR § 1000.336(d). If you believe there was an error in processing or that the data is incorrect, you may submit additional documentation to support the unit(s) eligibility. Please refer to the Formula Response Form Appendices below for additional guidance on the documentation required for reporting discrepancies:

- Appendix A1 for units that are conveyance eligible or conveyed
- Appendix A2 for changes due to Date of Full Availability of FCAS units
- Appendix A3 for changes due to conversion of FCAS units
- Appendix A4 for demolished and rebuilt FCAS units
- Appendix A5 for all other FCAS changes.

These can all be found at:

https://ihbgformula.com/PDF/FY_2021_Appendices_A_through_D.pdf

Thank you for submitting these corrections. Your active participation ensures that allocations are fair and accurate. As you know, you will receive the Formula Response Form and subsequent Allocation and Formula Data form on an annual basis to help in your review and correction, as needed, of this important information.

Should you have any questions, please contact the IHBG Formula Customer Service Center at:

2614 Chapel Lake Drive
Gambrills, MD 21054
Phone: 800-410-8808
Fax: 202-393-6411
E-Mail: IHBGformula@firstpic.org

Sincerely,



for

Hilary Atkin
Director, Office of Grants Management

cc: Coquille Indian Tribe