

# **United States Department of the Treasury**

## **Homeowner Assistance Fund Plan Submitted by Coquille Indian Housing Authority**

HAF Grantee Plan Name  
**HAFP-0247**

# United States Department of the Treasury

## Homeowner Assistance Fund Plan For Participants with Allocations Under \$5 million

Allocation Amount	Less than \$5 Million
Submission Date	10/3/2022 6:29 PM
Total Plan Requested Amount	\$841,816.00
Record Type	Tribe
Application Record	<a href="#">SLT-8651</a>
HAF Grantee Plan Status (external)	Submitted

# Homeowner Needs and Community Engagement

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## What Quantitative Data Has Informed the Participant's Planning?

Treasury will assess the extent to which a Participant has, in the course of its HAF planning process, relied on quantitative data, including from community-based organizations or organizations that serve potentially eligible homeowners.

In its HAF planning process, has the Participant obtained quantitative data from mortgage servicers, private data providers, government entities, community-based organizations, or other sources to inform its planning about how to target and best serve eligible homeowners with mortgage delinquencies, defaults, foreclosures?

**Yes**

If yes, please list and briefly describe each source of quantitative data.

**As of September 30, 2022, the Coquille Indian Tribe has 1,177 members living in 658 households nationwide. Of those households, approximately half reside within the Tribe's federally designated service area of Coos, Curry, Douglas, Jackson, and Lane Counties in Oregon. Census Bureau data indicate an AIAN homeownership rate of 54% suggesting that approximately 355 Tribal households are owned.**

**The records of participants in Tribal low-income rental housing programs serving the five-county area indicate that at least half of Tribal renter households are low-income compared to national median. Although income records for Tribal homeowners are not available through existing programs, data collected during the HAF pilot program indicate a similar number of Tribal homeowners will qualify for HAF assistance.**

**Needs data supplied by the U.S. Department of Housing and Urban Development show the following characteristics for all American Indian/Alaska Native (AIAN) households residing within the Tribe's service area:**

**AIAN households with annual income:**

- Less than 30% of median income 131**
- Between 30% and 50% of median income 116**
- Between 50% and 80% of median income 135**

**AIAN households which are overcrowded or without kitchen or plumbing 54**

**AIAN households with housing cost burden greater than 50% of annual income 149**

**Through its HAF pilot program, the Coquille Indian Housing Authority has assisted the membership nationwide with mortgage, utilities, internet service, property taxes, homeowners' insurance, habitability repairs, and accessibility modifications. Since the pilot program launched in November 2021, approximately 60 applications have been requested by Tribal families and other AIAN or socially disadvantaged families. As of September 30, 2022, 30 applications have been received and 20 families have been served. Assistance has averaged \$10,581 per household and is capped at \$17,500.**

Has the Participant requested and received input on its HAF planning process from tribal councils, community-based organizations, providers of housing counseling, or providers of legal assistance to homeowners facing foreclosure or displacement?

**Yes**

If yes, please list the tribal councils, community-based organizations, or providers, including each organization's address and a website if available.

<b>Organization Name</b>	<b>Address</b>	<b>Website</b>
Coquille Indian Tribe	3050 Tremont St. , North Bend, Oregon 97459	<a href="http://www.coquilletribe.org">http://www.coquilletribe.org</a>

# Program Design

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## **What are the Program Design Elements Through Which the Participant Will Deliver HAF Assistance to Eligible Homeowners?**

A program design element is a specific activity or program, which is consistent with a qualified expense category, under which a Participant will disburse HAF funds in accordance with the HAF Plan. Please note that multiple program design elements may fit under a single qualified expense category; for example, a mortgage assistance program that has different terms for federally backed mortgages and manufactured-home mortgages may constitute two separate program design elements, for which case the Participant provides a separate term sheet or other description for each program design element.

HAF participants must have at least one program design element intended to reduce mortgage delinquency among targeted populations. Treasury encourages HAF participants to consider program design elements that address homeownership preservation for targeted populations in areas where there is a sustained trend of increasing property taxes or utility costs, including for households that do not have mortgages.

Please identify each qualified expense category in which the Participant will offer a program design element by checking the boxes below.

- mortgage payment assistance
- mortgage principal reduction, including with respect to a second mortgage provided by a nonprofit or government entity
- payment assistance for homeowner's utilities, including electric, gas, home energy, and water
- payment assistance for homeowner's insurance, flood insurance, and mortgage insurance
- payment assistance for delinquent property taxes to prevent homeowner tax foreclosures
- payment assistance for down payment assistance loans provided by nonprofit or government entities
- financial assistance to allow a homeowner to reinstate a mortgage or to pay other housing-related costs related to a period of forbearance, delinquency, or default
- facilitating mortgage interest rate reductions
- payment assistance for homeowner's internet service, including broadband internet access service, as defined in 47 CFR 8.1(b)
- payment assistance for homeowner's association fees or liens, condominium association fees, or common charges
- measures to prevent homeowner displacement, such as home repairs to maintain the habitability of a home or assistance to enable households to receive clear title to their properties

For each program design element that the Participant will offer, the Participant is required to upload a term sheet or other description, that, at a minimum, provides the following information regarding that program design element. Term sheets for all of Participant's HAF programs may be uploaded together as one document.

Title	Upload Date
Coquille IHA HAF Plan Term Sheets	10/3/2022 4:38 PM

A HAF participant may elect to revise its HAF Plan over time to add or subtract program design elements. Does the Participant anticipate adding additional program design element(s) to this HAF Plan within one year of this submission?

No

### Documentation of Homeowner Income

Homeowners are eligible to receive amounts allocated to a HAF participant under the HAF only if they have incomes equal to or less than 150% of the area median income or 100% of the median income for the United States, whichever is greater. In addition, not less than 60% of amounts made available to each HAF participant must be used for qualified expenses that assist homeowners having incomes equal to or less than 100% of the area median income or equal to or less than 100% of the median income for the United States, whichever is greater. The HAF guidance describes permissible ways for HAF participants to determine homeowner income.

Under the HAF guidance, one permissible approach for determining income is for (1) the household to provide a written attestation as to household income and (2) the HAF participant to use a reasonable fact-specific proxy for household income, such as reliance on data regarding average incomes in the household's geographic area. Will the Participant allow income to be determined in this way?

Yes

If yes, please describe the fact-specific proxy or proxies to be used for the income determination.

**The Housing Authority's permissible approaches for determining income are: (1) the household may provide a written attestation as to household income together with supporting documentation such as paystubs, W-2s or other wage statements, IRS Form 1099s, tax filings, depository institution statements demonstrating regular income, or an attestation from an employer; or (2) the household may provide a written attestation as to household income and the Housing Authority may use a reasonable fact-specific proxy for household income, such as reliance on data regarding average incomes in the household's geographic area.**

Under the HAF guidance, HAF participants may provide waivers or exceptions to this documentation requirement as reasonably necessary to accommodate extenuating circumstances, such as disabilities, practical challenges related to the pandemic, or a lack of technological access by homeowners; in these cases, the HAF participant is still responsible for making the required determination regarding household income and documenting that determination. Will the Participant allow applicants to request such waivers or exceptions?

Yes

### Eligible Mortgage Types

Please indicate which of the following mortgage types are eligible to be assisted under one or more of the Participant's program design elements.

- First Mortgages
- Reverse Mortgages (Home Equity Conversion Mortgages, Single-Purposes Reverse Mortgages, or Proprietary Reverse Mortgages)
- Contracts for Deed or Land Contract (if it is a credit transaction secured by a consensual security interest in a dwelling)
- Second Mortgages
- Loans Secured by Manufactured Housing (secured by real estate or dwelling)

If the Participant excludes any of the forgoing mortgage types from one or more program design elements, explain the exclusion.

## Outreach

Will the Participant engage in outreach through partnerships with organizations that focus primarily on serving homeowners earning incomes below 100% of area median income or socially disadvantaged individuals and that have the capacity to engage targeted communities in a culturally and linguistically relevant manner to encourage the submission of applications for HAF resources from targeted populations?

**Yes**

If yes, please indicate whether the community outreach efforts will include partnerships with organizations that primarily target the following populations:

- member of a group that has been subjected to racial or ethnic prejudice or cultural bias within American society;
- resident of a majority-minority Census tract; (3) individual with limited English proficiency;
- resident of a U.S. territory, Indian reservation, or Hawaiian Home Land;
- homeowners that reside in persistent poverty counties;
- individual with limited English proficiency.

Please indicate in which languages, in addition to English, community outreach efforts to targeted populations will be undertaken:

**Other**

Please list any other languages.

**None.**

## **Housing Counseling and Legal Services**

Will the Participant facilitate access for eligible households to housing counseling or legal services?

**No**

If yes, please identify below the providers of housing counseling or legal services that have indicated to the Participant that they are willing and able to support homeowners receiving assistance under the Participant's HAF programs.

Please indicate all of the languages, in addition to English, in which HAF related outreach or communications activities will be undertaken.

**Other**

Please list any other languages.

**None.**

## **What Efforts will be Made to Address Barriers to HAF Program Participation for Potentially Eligible Homeowners, Including Those with Limited English Proficiency or Who are Disabled?**

Targeted outreach may be needed to reach homeowners who are likely to experience barriers to access, including persons with limited English proficiency and those with disabilities.

Indicate all of the languages, in addition to English, in which the Participant's HAF application and other program documents will be made available.

**Other**

Please list any other languages.

**None.**

Will the Participant's HAF applications and other program documents be provided in forms that are accessible to persons with disabilities?

**Yes**

Please explain any other efforts being undertaken by the Participant to facilitate access to HAF resources by potentially eligible homeowners that are likely to experience barriers to their access?



## Performance Goals

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Treasury will consider the goals and benchmarks the Participant proposes to use to measure the effectiveness of its programs, including whether those goals address the homeowner needs identified by the Participant, the extent to which the goals are disaggregated by key homeowner characteristics as appropriate for the jurisdiction, and whether they include a goal focused on reducing mortgage delinquency.

Please describe Participant's goals and benchmarks for each of its programs with the following program design elements.

<b>Program Design Element</b>	<b>Metric of Success</b>	<b>Goal</b>
Mortgage Payment Assistance	Households assisted	Up to 40 households
Payment Assistance for Homeowners Utilities	Households assisted	Up to 40 households
Payment Assistance for Homeowner's Internet Service	Households assisted	Up to 40 households
Mortgage Reinstatement	Households assisted	Up to 40 households
Payment Assistance for Homeowner's Insurance	Households assisted	Up to 40 households
Mortgage Principal Reduction	Households assisted	Up to 40 households
Facilitate Mortgage Interest Rate Reduction	Households assisted	Up to 40 households
Payment Assistance for HOA fees or liens	Households assisted	Up to 40 households
Other measures to prevent homeowner displacement	Households assisted	Up to 40 households
Payment Assistance for Down Payment Assist. Loans	Households assisted	Up to 40 households
Payment Assistance for Delinquent Property Taxes	Households assisted	Up to 40 households

# Readiness

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## **Staffing, Systems and Contractors**

Treasury seeks information regarding the Participant's organizational capacity to implement its HAF Plan.

Does the Participant anticipate needing to hire additional staff to implement this HAF Plan?

**No**

Does the Participant anticipate significant information technology system upgrades to implement this HAF Plan?

**No**

Does the Participant have policies or procedures that govern the implementation of each HAF program design element described in this HAF Plan?

**Yes**

Does the Participant have policies or procedures that govern the implementation of each HAF program design element described in this HAF Plan?

**Yes**

Will the Participant use HAF funds to assist eligible households through a program that was operational before the Participant first received HAF funds?

**No**

Will the Participant use any third-party contractor or partner to conduct program administration (such as reviewing applications, determining eligibility, processing payments, conducting reporting, and reviewing compliance) for some or all of the Participant's HAF programs?

**No**

Please provide a brief description of how the Participant has used any HAF funds it has already received.

**Pilot program funds have been used for administrative costs; payment assistance for mortgage, utilities, internet service, property taxes, homeowners' insurance; habitability repairs; and, accessibility modifications.**

# Budget

## **Budgeting of HAF Funds by Program Design Element**

Specify the amounts of HAF funds that the Participant proposes to allocate to each of the following program design elements, if offered:

<b>Measure</b>	<b>Amount</b>
Mortgage Payment Assistance	\$107,333.00
Mortgage Principal Reduction	\$14,310.00
Payment Assistance for Homeowner's Internet Service	\$7,155.00
Payment Assistance for HOA fees or liens	\$7,155.00
Payment Assistance for Delinquent Property Taxes	\$7,155.00
Mortgage Reinstatement	\$7,155.00
Facilitate Mortgage Interest Rate Reduction	\$7,155.00
Payment Assistance for Homeowner's Insurance	\$7,155.00
Payment Assistance for Down Payment Assist. Loans	\$7,155.00
Payment Assistance for Homeowners Utilities	\$21,466.00

### **Other measures to prevent homeowner displacement**

<b>Measure</b>	<b>Amount</b>
Habitability repairs and accessibility modifications	\$522,350.00

Displacement Prevention Sub-Total:	<b>\$0.00</b>
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### **Counseling or Legal Services**

The Participant may allocate up to 5% of its HAF funds for counseling or educational efforts by housing counseling agencies approved by the Department of Housing and Urban Development or a tribal government, or legal services, target to households eligible to be served with funding from the HAF related to foreclosure prevention or displacement.

<b>Specify the Participant's allocations for the following</b>	<b>Amount</b>
Counseling or Educational Services	\$0.00
Legal Services	\$0.00

Services Sub-Total	<b>\$0.00</b>
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### **Reimbursement of Funds Expended After January 21, 2020**

As described in the HAF guidance, HAF funds may be used for reimbursement of certain expenses between January 21, 2020 and the date when the first HAF funds are disbursed by the HAF participant under the HAF for a qualified expense (with certain limitations, as set forth in the HAF guidance).

<b>Type of Expense</b>	<b>Amount</b>
N/A	\$0.00

Reimbursement Sub-Total	<b>\$0.00</b>
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### **Allocation of Administrative Expenses**

<b>Type of Expense</b>	<b>Amount</b>
Administrative expenses such as staffing, professional services, supplies and equipment, bank fees, postage, and similar costs.	\$126,272.00

Administrative Expenses Sub-Total	<b>\$126,272.00</b>
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<b>Total Plan Requested Amount</b>	<b>\$841,816.00</b>
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Amount Requested Confirmation:

**Yes**

# Contacts

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Please identify up to three contacts for the Participant- a primary contact, a designated point of contact for reporting, and an additional contact.

## Primary Contact

Name: **Anne Cook**

Agency/Office: **Coquille Indian Housing Authority**

Email: [annecook@coquilleiha.org](mailto:annecook@coquilleiha.org)

Phone Number: **5418886501**

## Reporting Contact

Name: **Debbie Dennis**

Agency/Office: **Coquille Indian Housing Authority**

Email: [debbiedennis@coquilleiha.org](mailto:debbiedennis@coquilleiha.org)

Phone Number: **5418886501**

## Additional Contact

Name: **Marcy Chytka**

Agency/Office: **Coquille Indian Housing Authority**

Email: [marcychytka@coquilleiha.org](mailto:marcychytka@coquilleiha.org)

Phone Number: **5418886501**

## Title VI Assurances

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You must provide on behalf of the HAF Participant assurances that the HAF Participant will comply with Title VI of Civil Rights Act of 1964. Please download the assurances, then review, sign, and upload the signed copy to this page before submitting the HAF Plan.

Title	Upload Date
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# Official Certification

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I (the undersigned) certify that the information provided in the HAF submission is accurate and complete after reasonable inquiry of people, systems, and other information available to the HAF Participant. The HAF participant and I acknowledge that any materially false, fictitious, or fraudulent statement or representation (or concealment or omission of material fact) in this submission may be the subject of criminal prosecution under the False Statements Accountability Act of 1996, as amended, 18 U.S.C. § 1001 and also may subject me and HAF Participant to civil penalties and/or administrative remedies for false claims or otherwise, (including 31 U.S.C. §3729 et seq.). I am an authorized representative of HAF Participant with authority to make the above certifications and representations on behalf of the HAF Participant.

Name of HAF Participant:

**Coquille Indian Housing Authority**

Name and Title of Certifying Official

Name: **Anne Cook**

Title: **Executive Director**

Telephone: **5418886501**

Email: [annecook@coquilleiha.org](mailto:annecook@coquilleiha.org)