



Coquille Indian Housing Authority

2678 Mexeye Loop • Coos Bay, OR 97420



Annual Performance Report

for the fiscal year ended

SEPTEMBER 30, 2012

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. HUD may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget (OMB) control number.

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, respondents 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.

NOTE: Grants awarded under the American Recovery and Reinvestment Act (Recovery Act) are excluded from this process. Grants under the Recovery Act continue to use the stand alone APR (HUD-52735-AS).

FORM COMPLETION OPTIONS: The IHP/APR form may be completed either in hard copy or electronically. Hard copy versions may be completed either by hand or typewriter. Alternatively, the form may be completed electronically as it is a Word document. To check a box in the form double-click on the box and a window will open, under the default value section select the "Checked" button. It is recommended that the form be completed electronically because it is more efficient to complete, submit, and review the form. Furthermore, electronic versions of the form may be submitted to HUD as an email attachment. To document official signatures on the electronic version, you should sign a hard copy of the pages and either fax that signed page or email it as an attachment to your Area Office of Native American Programs. Pages of the IHP section that require an official signature include pages, 4, 20, 21, and 22. Pages of the APR section that require an official signature include pages 4 and 25.

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COVER PAGE

SECTION 1:

- (1) Initial Plan (Complete this Section then proceed to Section 3)
- (2) Amended Plan (Complete this Section and Section 2)
- (3) Annual Performance Report (Complete the APR signature (items 26-29) and proceed to Section 4)
- (4) Tribe
- (5) TDHE

(6) Name of Recipient: Coquille Indian Housing Authority		
(7) Contact Person: Anne F. Cook, Executive Director		
(8) Telephone Number with Area Code: (541) 888-6501		
(9) Mailing Address: 2678 Mexeye Loop		
(10) City: Coos Bay	(11) State: Oregon	(12) Zip Code: 97420
(13) Fax Number with Area Code (if available): (541) 888-8266		
(14) Email Address (if available): annecook@coquilleiha.org		
(15) If TDHE, List Tribes Below: Coquille Indian Tribe 3050 Tremont Street North Bend, OR 97459 Telephone number: (541) 756-0904 Fax number: (541) 756-0847		
(16) Tax Identification Number: 93-1133051		
(17) DUNS Number: 944212935		
(18) CCR Number: 5GEV5		
(19) IHBG Annual Grant Amount: \$1,023,270		
(20) Recipient Program Year: October 1, 2011 through September 30, 2012		

(21) Name of Authorized IHP Submitter: Anne F. Cook
(22) Title of Authorized IHP Submitter: Executive Director
(23) Signature of Authorized IHP Submitter: <i>Anne F. Cook</i>
(24) IHP Submission Date: June 3, 2011
(25) Name of Authorized APR Submitter: Anne F. Cook
(26) Title of Authorized APR Submitter: Executive Director
(27) Signature of Authorized APR Submitter: <i>Anne F. Cook</i>
(28) APR Submission Date: December 19, 2012

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.

IHP AMENDMENTS

(24 CFR § 1000.232)

**Use this section for IHP amendments only.
If you are not amending an IHP, proceed to Section 3 (Housing Needs).**

SECTION 2: Fill out the text below to summarize your IHP amendment. This amendment is only required to be submitted to the HUD Area Office of Native American Programs when (1) the recipient is adding a new activity that was not described in the current One-Year Plan that has been determined to be in compliance by HUD or (2) to reduce the amount of funding that was previously budgeted for the operation and maintenance of 1937 Act housing under NAHASDA § 202(1). All other amendments should be made locally by the recipient and placed in the recipient's files.

<p>(1) Program Name: Accessibility Modifications to CIHA Office – 1212 <i>This is a model activity carried over from the prior year, approved as FY 2010 IHP Goal Y10-4, Objective Y10-4.1, Performance Objective Y10-4 (a). It was anticipated that this activity would be complete by the end of FY 2011 when the FY 2012 IHP was submitted in July 2011. However, because the project primarily entailed indoor work, it was deferred to accommodate other weather-dependent outdoor activities. It is inserted into the One-Year Plan and Annual Performance Report as Program 9.</i></p>
<p>(2) Program Description <i>(This should adequately describe the new program that is planned.):</i> This program is designed to: a. Modify the Housing Authority office to conform with Section 504 accessibility standards for mobility impaired persons</p>
<p>(3) Eligible Activity Number <i>(Select one activity from the Eligible Activities list below.):</i> (21) Model Activities [202(6)]</p>

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

(1) Modernization of 1937 Act Housing [202(1)]	(13) Downpayment/Closing Cost Assistance [202(2)]
(2) Operation of 1937 Act Housing [202(1)]	(14) Lending Subsidies for Homebuyers [202(2)]
(3) Acquisition of Rental Housing [202(2)]	(15) Other Homebuyer Assistance Activities [202(2)]
(4) Construction of Rental Housing [202(2)]	(16) Rehabilitation Assistance to Existing Homeowners [202(2)]
(5) Rehabilitation of Rental Housing [202(2)]	(17) Tenant Based Rental Assistance [202(3)]
(6) Acquisition of Land for Rental Housing Development [202(2)]	(18) Other Housing Service [202(3)]
(7) Development of Emergency Shelters [202(2)]	(19) Housing Management Services [202(4)]
(8) Conversion of Other Structures to Affordable Housing [202(2)]	(20) Crime Prevention and Safety [202(5)]
(9) Other Rental Housing Development [202(2)]	(21) Model Activities [202(6)]
(10) Acquisition of Land for Homebuyer Unit Development [202(2)]	(22) Self-Determination Program [231-235]
(11) New Construction of Homebuyer Units [202(2)]	(23) Infrastructure to Support Housing [202(2)]
(12) Acquisition of Homebuyer Units [202(2)]	(24) Other – must provide description in the box above

(4) Intended Outcomes (Select from the list below.):

- (8) Provide accessibility for disabled/elderly persons

Intended Outcomes May Include:

(1) Reduce over-crowding	(6) Create new affordable rental units
(2) Assist renters to become homeowners	(7) Assist affordable housing for students
(3) Improve quality of substandard units	(8) Provide accessibility for disabled/elderly persons
(4) Improve quality of existing infrastructure	(9) Improve energy efficiency
(5) Address homelessness	(10) Reduction in crime reports
	(11) Other – must provide description in the box above

(5) Who Will Be Assisted (*This should adequately describe the types of households who will be assisted under the program. Please note: assistance made available to families whose incomes fall within 80 to 100 percent of the median income should be included as a separate Program within this Section.*):

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

(6) Types and Level of Assistance (*This should adequately describe any types of assistance and the level of assistance that will be provided to each household.*):

Work will be performed by Housing Authority staff or contractors at no cost to applicants or residents.

(7) Amended Table on Anticipated Outputs for 12-Month Program Year (insert as many rows as needed)

Program Name (Tie to program name in 1 above.)	Planned Number of Units To Be Completed in Program Year	Planned Number of Households To Be Served in Program Year
Section 504 Modifications to CIHA Office – 1212	N/A	N/A

(8) Budget Amendment (insert as many rows as needed)

Program Name <i>(Tie to program name in 1 above and include all other programs still funded during 12-month program year.)</i>	IHBG funds budgeted to be expended in 12-month program year	Other funds budgeted to be expended in 12-month program year	Total funds budgeted to be expended in 12-month program year
Modernization and Rehabilitation of 1937 Housing Act Units – 1201.1	\$ 25,000	\$435,000	\$ 460,000
Accessibility Modifications to 1937 Housing Act Units – 1201.2	47,157		47,157
Conversion of Rental Units to Homebuyer Units – 1201.3	30,000		30,000
Operation and Maintenance of 1937 Housing Act units – 1202	412,494	92,500	504,994
Tenant Based Rental Assistance – 1209.1	146,935		146,935
Housing Services – 1209.2	23,065		23,065
Housing Management Services – 1210	150,000	92,500	242,500
Crime Prevention and Safety – 1211	30,500		30,500
Accessibility Modifications to CIHA Office – 1212	30,000		30,000
Program Administration – 1213	204,654		204,654
Loan Repayment			
Total:	\$1,099,805	\$620,000	\$1,719,805

- (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 74 affordable housing units on Coquille Tribal Lands including 53 rentals, 1 emergency housing unit, and 20 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 Payments (MHAP) program offers 35 tenant-based rental assistance slots to low-income Coquille and other Native American and Alaska Native households throughout the Tribe's five-county service area.

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 program intends to distribute assistance 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 4: 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 intended outcome, planned outputs, who will be assisted, and types and levels of assistance. 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, and any reasons for delays.

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

(1) Modernization of 1937 Act Housing [202(1)]	(13) Downpayment/Closing Cost Assistance [202(2)]
(2) Operation of 1937 Act Housing [202(1)]	(14) Lending Subsidies for Homebuyers [202(2)]
(3) Acquisition of Rental Housing [202(2)]	(15) Other Homebuyer Assistance Activities [202(2)]
(4) Construction of Rental Housing [202(2)]	(16) Rehabilitation Assistance to Existing Homeowners [202(2)]
(5) Rehabilitation of Rental Housing [202(2)]	(17) Tenant Based Rental Assistance [202(3)]
(6) Acquisition of Land for Rental Housing Development [202(2)]	(18) Other Housing Service [202(3)]
(7) Development of Emergency Shelters [202(2)]	(19) Housing Management Services [202(4)]
(8) Conversion of Other Structures to Affordable Housing [202(2)]	(20) Crime Prevention and Safety [202(5)]
(9) Other Rental Housing Development [202(2)]	(21) Model Activities [202(6)]
(10) Acquisition of Land for Homebuyer Unit Development [202(2)]	(22) Self-Determination Program [231-235]
(11) New Construction of Homebuyer Units [202(2)]	(23) Infrastructure to Support Housing [202(2)]
(12) Acquisition of Homebuyer Units [202(2)]	(24) Other – must provide description in box 1.3 (IHP) below

Outcome May Include:

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

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>1.1. Program Name and Unique Identifier: Modernization and Rehabilitation of 1937 Housing Act Units – 1201.1</p>
<p>1.2. Program Description <i>(This should be the description of the planned program.):</i> This program is designed to:</p> <ul style="list-style-type: none">a. Continue modernization and rehabilitation of units begun in prior years.b. Perform critical repairs to stabilize units awaiting roofing rehabilitation.c. Provide project management and oversight of roofing rehabilitation work.
<p>1.3. Eligible Activity Number <i>(Select one activity from the Eligible Activity list.):</i> (1) Modernization of 1937 Act Housing [202(1)]</p>
<p>1.4. Intended Outcome Number <i>(Select one outcome from the Outcome list.):</i> (3) Improve quality of substandard units</p>
<p>1.5. Actual Outcome Number <i>(In the APR identify the actual outcome from the Outcome list.):</i> (3) Improve quality of substandard units</p>

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.):

Residents of 1937 Housing Act 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.):

Work will be performed by Housing Authority staff or contractors at no cost to residents. Level of assistance will vary by need and other sources of funding.

1.8. APR: Describe the accomplishments for the APR in the 12-month program year.

- a. Performed final inspection and issued retainage payment for one unit of siding rehabilitation, bringing the Housing Authority's ten-year Siding Rehabilitation Project to a close.
- b. Repaired storm damage to 46 units awaiting roofing rehabilitation.
- c. Began work on the Housing Authority's Roofing Rehabilitation Project designed to replace the roofs of 68 1937 Housing Act units. A portion of the project management and oversight costs were funded by the IHBG. Construction and other associated costs were funded by HUD's ICDBG and USDA's RD HPG programs. 56 units were complete and 12 units were in progress at year end. Final inspection and retainage payments will occur in the next fiscal period.

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

Planned Number of Units To Be Completed in Year Under this Program	Planned Number of Households To Be Served in Year Under this Program	APR: Actual Number of Units Completed in Program Year	APR: Actual Number of Households Served in Program Year
36	N/A	47	N/A

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

Program is ahead of schedule.

NOTE: Remember to complete all the text boxes in Section 4 for each IHBG-funded program. If you are completing an electronic version of this form, you may copy and paste text boxes 1.1 through 1.10 as needed to describe each of your programs. If you are completing this form in hard copy, you may photocopy Section 4 as needed to describe each of your programs.

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>2.1. Program Name and Unique Identifier: Accessibility Modifications to 1937 Housing Act Units – 1201.2</p>
<p>2.2. Program Description <i>(This should be the description of the planned program.):</i> This program is designed to: a. Modify one rental unit to conform with Section 504 accessibility standards for mobility impaired persons.</p>
<p>2.3. Eligible Activity Number <i>(Select one activity from the Eligible Activity list.):</i> (1) Modernization of 1937 Act Housing [202(1)]</p>
<p>2.4. Intended Outcome Number <i>(Select one outcome from the Outcome list.):</i> (8) Provide accessibility for elderly/disabled persons</p>
<p>2.5. Actual Outcome Number <i>(In the APR identify the actual outcome from the Outcome list.):</i> (8) Provide accessibility for elderly/disabled persons</p>

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.):

Residents of 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.):

Work will be performed by Housing Authority staff or contractors at no cost to residents. Level of assistance is estimated to be \$30,000 or less per unit.

2.8. APR: Describe the accomplishments for the APR in the 12-month program year.

- a. Modified one rental unit to conform with Section 504 accessibility standards for mobility impaired persons. Construction of an addition to the home was necessary to accommodate the required bathroom modifications, causing the cost to be somewhat higher than anticipated.

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

Planned Number of Units To Be Completed in Year Under this Program	Planned Number of Households To Be Served in Year Under this Program	APR: Actual Number of Units Completed in Program Year	APR: Actual Number of Households Served in Program Year
1	N/A	1	N/A

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

Program is on schedule.

NOTE: Remember to complete all the text boxes in Section 4 for each IHBG-funded program. If you are completing an electronic version of this form, you may copy and paste text boxes 1.1 through 1.10 as needed to describe each of your programs. If you are completing this form in hard copy, you may photocopy Section 4 as needed to describe each of your programs.

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>3.1. Program Name and Unique Identifier: Conversion of Rental Units to Homebuyer Units – 1201.3</p>
<p>3.2. Program Description <i>(This should be the description of the planned program.):</i> This program is designed to: a. Effect transition from rental program to homebuyer program for one qualified family upon successful completion of homebuyer education and financial readiness requirements.</p>
<p>3.3. Eligible Activity Number <i>(Select one activity from the Eligible Activity list.):</i> (1) Modernization of 1937 Act Housing [202(1)]</p>
<p>3.4. Intended Outcome Number <i>(Select one outcome from the Outcome list.):</i> (2) Assist renters to become homeowners</p>
<p>3.5. Actual Outcome Number <i>(In the APR identify the actual outcome from the Outcome list.):</i> (2) Assist renters to become homeowners</p>

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 Rent program participants.

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

Upon entry into the HomeGO program, a participant will be allowed 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 is 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.

3.8. APR: Describe the accomplishments for the APR in the 12-month program year.

- a. One family in the low rent program successfully completed homebuyer counseling and transitioned to the HomeGO homebuyer program during the period.

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

Planned Number of Units To Be Completed in Year Under this Program	Planned Number of Households To Be Served in Year Under this Program	APR: Actual Number of Units Completed in Program Year	APR: Actual Number of Households Served in Program Year
1	N/A	1	N/A

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

Program is on schedule.

NOTE: Remember to complete all the text boxes in Section 4 for each IHBG-funded program. If you are completing an electronic version of this form, you may copy and paste text boxes 1.1 through 1.10 as needed to describe each of your programs. If you are completing this form in hard copy, you may photocopy Section 4 as needed to describe each of your programs.

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>4.1. Program Name and Unique Identifier: Operation and Maintenance of 1937 Housing Act Units – 1202</p>
<p>4.2. Program Description <i>(This should be the description of the planned program.):</i> This program is designed to:</p> <ul style="list-style-type: none">a. Maintain a 95% occupancy rate in the Low Rent program.b. Perform routine and periodic maintenance as scheduled.c. Perform emergency and non-routine maintenance as necessary.d. Prepare units for re-occupancy in a timely manner.e. Improve the front lawn of one rental unit.f. Maintain and improve common areas and facilities in the housing community.g. Continue use of one unit as an interim maintenance operations and storage facility pending warehouse rehabilitation or replacement.
<p>4.3. Eligible Activity Number <i>(Select one activity from the Eligible Activity list.):</i> (2) Operation of 1937 Act Housing [202(1)]</p>
<p>4.4. Intended Outcome Number <i>(Select one outcome from the Outcome list.):</i> (11) Preserve, improve, and ensure efficient operation of housing units and common facilities</p>
<p>4.5. Actual Outcome Number <i>(In the APR identify the actual outcome from the Outcome list.):</i> (11) Preserve, improve, and ensure efficient operation of housing units and common facilities</p>

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.):

Residents of 1937 Housing Act units.

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

Work will be performed by Housing Authority staff or contractors, generally at no cost to residents. Costs to remedy damage or failure to perform required maintenance tasks will be assessed to residents in accordance with policy.

4.8. APR: Describe the accomplishments for the APR in the 12-month program year.

- a. Low rent units, including one emergency housing unit, were maintained at an occupancy rate of 98% throughout the year.
- b. Periodic maintenance was performed on 9 units simultaneous with turnover.
- c. Performed emergency or non-routine maintenance on 10 units.
- d. Preparation for re-occupancy averaged 55 calendar days.
- e. Made landscaping improvements to the front lawn of one rental unit.
- f. Performed routine maintenance on common areas and facilities throughout the housing area. Repainted curbs, speed bumps, and parking lot striping. Installed gravel to improve walkways in Community Garden. Installed additional plantings and bark mulch in Cultural Garden.
- g. Continued use of one unit as an interim maintenance operations and storage facility pending warehouse rehabilitation or replacement.

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

Planned Number of Units To Be Completed in Year Under this Program	Planned Number of Households To Be Served in Year Under this Program	APR: Actual Number of Units Completed in Program Year	APR: Actual Number of Households Served in Program Year
67	N/A	65	N/A

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

Fewer units/families were served than planned because it was found that two had become eligible for conveyance prior to the beginning of the period.

NOTE: Remember to complete all the text boxes in Section 4 for each IHBG-funded program. If you are completing an electronic version of this form, you may copy and paste text boxes 1.1 through 1.10 as needed to describe each of your programs. If you are completing this form in hard copy, you may photocopy Section 4 as needed to describe each of your programs.

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>5.1. Program Name and Unique Identifier: Tenant Based Rental Assistance – 1209.1</p>
<p>5.2. Program Description <i>(This should be the description of the planned program.):</i> This program is designed to: a. Assist eligible low income Native Americans and Alaska Natives to pay rent in private market rental units. b. Maintain a 100% utilization rate.</p>
<p>5.3. Eligible Activity Number <i>(Select one activity from the Eligible Activity list.):</i> (17) Tenant Based Rental Assistance [202(3)]</p>
<p>5.4. Intended Outcome Number <i>(Select one outcome from the Outcome list.):</i> (11) Assist affordable housing for low-income Native Americans and Alaska Natives</p>
<p>5.5. Actual Outcome Number <i>(In the APR identify the actual outcome from the Outcome list.):</i> (11) Assist affordable housing for low-income Native Americans and Alaska Natives</p>

5.6. 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.

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

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.

5.8. APR: Describe the accomplishments for the APR in the 12-month program year.

- a. Provided subsidy to eligible low income Native Americans and Alaska Natives to assist with payment of rent in private market rental units.
- b. Maintained a 96% utilization rate.

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

Planned Number of Units To Be Completed in Year Under this Program	Planned Number of Households To Be Served in Year Under this Program	APR: Actual Number of Units Completed in Program Year	APR: Actual Number of Households Served in Program Year
N/A	35	N/A	36

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

Utilization was lower than desired due to participant activity. An allowance of 90 days is made for participants who become inactive to return to active status. Also, new placements are allowed up to 90 days to begin active participation. We "overbook" the program at times to offset these periods of inactivity resulting in a greater number of households being served during the period than planned.

NOTE: Remember to complete all the text boxes in Section 4 for each IHBG-funded program. If you are completing an electronic version of this form, you may copy and paste text boxes 1.1 through 1.10 as needed to describe each of your programs. If you are completing this form in hard copy, you may photocopy Section 4 as needed to describe each of your programs.

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>6.1. Program Name and Unique Identifier: Housing Services – 1209.2</p>
<p>6.2. Program Description (<i>This should be the description of the planned program.</i>):</p> <p>This program is designed to:</p> <ol style="list-style-type: none">a. Provide materials and instruction in housekeeping practices and living habits that reduce maintenance costs, improve housekeeping, and promote resident safety.b. Counsel current and prospective homebuyers on maintenance and financial responsibilities.c. Provide support for meetings and activities of the Residents Association.d. Maintain partnerships with Tribal and other community social and support services providers and refer applicants and participants as necessary.e. Promote and facilitate 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.f. Provide rental space at a reduced rate to Tribal programs that directly promote the self-sufficiency of program participants.
<p>6.3. Eligible Activity Number (<i>Select one activity from the Eligible Activity list.</i>):</p> <p>(18) Other Housing Service [202(3)]</p>

6.4. Intended Outcome Number *(Select one outcome from the Outcome list.):*

- (11) Assist applicants and participants to acquire or retain affordable housing, support resident organizations, and facilitate access to self-sufficiency services

6.5. Actual Outcome Number *(In the APR identify the actual outcome from the Outcome list.):*

- (11) Assist applicants and participants to acquire or retain affordable housing, support resident organizations, and facilitate access to self-sufficiency services

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 American and Alaska Native applicants and housing program participants.

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

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

6.8. APR: *Describe the accomplishments for the APR in the 12-month program year.*

- a. Materials and instruction in housekeeping practices and living habits that reduce maintenance costs was 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. Three families in the low rent program and one family in the rental assistance program participated in homebuyer counseling during the period.
- c. Promoted and assisted with Residents Association meetings, fundraisers, and other activities.
- d. 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.
- e. 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.
- f. Space in the Housing Authority office and at other housing facilities was provided to the Tribe for fiber optic and wireless transmission equipment to provide low-cost internet access to housing community residents and facilities. Space in the Housing Authority office was also provided for the Tribe's tsunami alert system and emergency communications equipment serving the housing community and surrounding area. One rental unit was leased to the Tribe's Education Department and Library at a reduced rate to support the location of those services within the housing community. One unit was also 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.

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

Planned Number of Units To Be Completed in Year Under this Program	Planned Number of Households To Be Served in Year Under this Program	APR: Actual Number of Units Completed in Program Year	APR: Actual Number of Households Served in Program Year
N/A	109	N/A	107

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

Fewer units/families were served than planned because it was found that two had become eligible for conveyance prior to the beginning of the period.

NOTE: Remember to complete all the text boxes in Section 4 for each IHBG-funded program. If you are completing an electronic version of this form, you may copy and paste text boxes 1.1 through 1.10 as needed to describe each of your programs. If you are completing this form in hard copy, you may photocopy Section 4 as needed to describe each of your programs.

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>7.1. Program Name and Unique Identifier: Housing Management Services – 1210</p>
<p>7.2. Program Description <i>(This should be the description of the planned program.):</i></p> <p>This program is designed to:</p> <ul style="list-style-type: none">a. Manage Low Rent, MHAP, Mutual Help, HomeGO, and Section 184 programs.b. Screen applications for assistance to determine program eligibility.c. Maintain a waiting list of qualified low-income Indian families and effect placement when assistance becomes available.d. Conduct annual and interim recertifications of family income and composition.e. Inspect rental units at least once per year and homebuyer units at least every three years. Document and monitor correction of deficiencies.f. Implement transitions between programs.g. Operate and maintain NAHASDA units.
<p>7.3. Eligible Activity Number <i>(Select one activity from the Eligible Activity list.):</i></p> <p>(19) Housing Management Services [202(4)]</p>
<p>7.4. Intended Outcome Number <i>(Select one outcome from the Outcome list.):</i></p> <p>(11) Ensure efficient, effective management of housing programs and preserve, improve, and ensure efficient operation of NAHASDA housing units and associated pro rata share of common facilities costs</p>

7.5. Actual Outcome Number (In the APR identify the actual outcome from the Outcome list.):

- (11) Ensure efficient, effective management of housing programs and preserve, improve, and ensure efficient operation of NAHASDA housing units and associated pro rata share of common facilities costs

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 applicants and housing 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.):

Work will be performed by Housing Authority staff at no cost to resident.

7.8. APR: Describe the accomplishments for the APR in the 12-month program year.

- a. Managed Low Rent, MHAP (tenant-based rental assistance), Mutual Help, HomeGO, and Section 184 programs.
- b. Screened 39 applications for assistance to determine program eligibility.
- c. Maintained a waiting list of qualified low-income Indian families and made placements when assistance became available.
- d. Conducted annual and interim recertifications of family income and composition.
- e. Inspected all rental and homebuyer units at least once during the period. Documented and monitored correction of deficiencies.
- f. Transitioned one family from the HomeGO homebuyer program to the low rent program. Transitioned one family from the low rent program to the MHAP tenant-based rental assistance program.
- g. Operated and maintained 4 Low Rent units constructed with NAHASDA funds.

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

Planned Number of Units To Be Completed in Year Under this Program	Planned Number of Households To Be Served in Year Under this Program	APR: Actual Number of Units Completed in Program Year	APR: Actual Number of Households Served in Program Year
N/A	109	N/A	107

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

Fewer units/families were served than planned because it was found that two had become eligible for conveyance prior to the beginning of the period.

NOTE: Remember to complete all the text boxes in Section 4 for each IHBG-funded program. If you are completing an electronic version of this form, you may copy and paste text boxes 1.1 through 1.10 as needed to describe each of your programs. If you are completing this form in hard copy, you may photocopy Section 4 as needed to describe each of your programs.

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>8.1. Program Name and Unique Identifier: Crime Prevention and Safety – 1211</p>
<p>8.2. Program Description (<i>This should be the description of the planned program.</i>):</p> <p>This program is designed to:</p> <ul style="list-style-type: none">a. Continue agreement with Tribal Police to provide services to the low-income housing community.b. Contract for security services and electronic surveillance of housing facilities.c. Install informational, directional, and traffic control signage in the housing community.
<p>8.3. Eligible Activity Number (<i>Select one activity from the Eligible Activity list.</i>):</p> <p>(20) Crime Prevention and Safety [202(5)]</p>
<p>8.4. Intended Outcome Number (<i>Select one outcome from the Outcome list.</i>):</p> <p>(10) Reduction in crime reports</p>
<p>8.5. Actual Outcome Number (<i>In the APR identify the actual outcome from the Outcome list.</i>):</p> <p>(10) Reduction in crime reports</p>

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.):

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.):

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

8.8. APR: Describe the accomplishments for the APR in the 12-month program year.

- 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 new informational, directional, and traffic control signage was not required during the period.

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

Planned Number of Units To Be Completed in Year Under this Program	Planned Number of Households To Be Served in Year Under this Program	APR: Actual Number of Units Completed in Program Year	APR: Actual Number of Households Served in Program Year
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))

Fewer units/families were served than planned because it was found that two had become eligible for conveyance prior to the beginning of the period.

NOTE: Remember to complete all the text boxes in Section 4 for each IHBG-funded program. If you are completing an electronic version of this form, you may copy and paste text boxes 1.1 through 1.10 as needed to describe each of your programs. If you are completing this form in hard copy, you may photocopy Section 4 as needed to describe each of your programs.

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>9.1. Program Name and Unique Identifier: Accessibility Modifications to CIHA Office – 1212</p>
<p>9.2. Program Description <i>(This should be the description of the planned program.):</i> This program is designed to: a. Modify the Housing Authority office to conform with Section 504 accessibility standards for mobility impaired persons.</p>
<p>9.3. Eligible Activity Number <i>(Select one activity from the Eligible Activity list.):</i> (21) Model Activities [202(6)] <i>(Approved in FY 2010 IHP.)</i></p>
<p>9.4. Intended Outcome Number <i>(Select one outcome from the Outcome list.):</i> (8) Provide accessibility for elderly/disabled persons</p>
<p>9.5. Actual Outcome Number <i>(In the APR identify the actual outcome from the Outcome list.):</i> (8) Provide accessibility for elderly/disabled persons</p>

9.6. 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.

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

Work will be performed by Housing Authority staff or contractors at no cost to applicants or residents.

9.8. APR: Describe the accomplishments for the APR in the 12-month program year.

- a. Updated scope of work, specifications, and drawings prepared in prior period. Contracted for major modifications to entry and restroom. Work on remaining tasks began but was not completed during the period. Additional work will be required to bring restroom into full compliance.

9.9. Planned and Actual Outputs for 12-Month Program Year

Planned Number of Units To Be Completed in Year Under this Program	Planned Number of Households To Be Served in Year Under this Program	APR: Actual Number of Units Completed in Program Year	APR: Actual Number of Households Served in Program Year
N/A	N/A	N/A	N/A

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

This is a model activity carried over from the prior year, approved as FY 2010 IHP Goal Y10-4, Objective Y10-4.1, Performance Objective Y10-4 (a). It was anticipated that this activity would be complete by the end of FY 2011 when the FY 2012 IHP was submitted in July 2011. However, because the project primarily entailed indoor work, it was deferred to accommodate other weather-dependent outdoor activities. The major modifications to the entry and restroom were completed during the current period. It is anticipated that the remaining tasks associated with this project will be completed in FY 2013.

NOTE: Remember to complete all the text boxes in Section 4 for each IHBG-funded program. If you are completing an electronic version of this form, you may copy and paste text boxes 1.1 through 1.10 as needed to describe each of your programs. If you are completing this form in hard copy, you may photocopy Section 4 as needed to describe each of your programs.

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>10.1. Program Name and Unique Identifier: Planning and Administration – 1213</p>
<p>10.2. Program Description <i>(This should be the description of the planned program.):</i></p> <p>This program is designed to:</p> <ul style="list-style-type: none">a. Coordinate and provide general oversight of all housing programs, services, and activities, including Board of Commissioners, administrative management, personnel management, property management, fiscal and financial management, resident eligibility and service standards, procurement and contracting, construction management, environmental review, records management, compliance review, policy standards, planning, reporting, development, and other relevant functions.b. Develop Indian Housing Plans and funding applications.c. Coordinate and provide for regular compliance monitoring and evaluation of Housing Authority operations.d. Prepare Annual Performance Reports and other funding and activity reports as required.
<p>10.3. Eligible Activity Number <i>(Select one activity from the Eligible Activity list.):</i></p> <p>(24) Planning and administration</p>
<p>10.4. Intended Outcome Number <i>(Select one outcome from the Outcome list.):</i></p> <p>(11) Ensure efficient, effective administration of housing programs</p>

10.5. Actual Outcome Number (In the APR identify the actual outcome from the Outcome list.):

(11) Ensure efficient, effective administration of housing programs

10.6. 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.

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

Work will be performed by Housing Authority staff or contractors at no cost to residents.

10.8. APR: Describe the accomplishments for the APR in the 12-month program year.

- a. Coordinated and provided general oversight of all housing programs, services, and activities, including Board of Commissioners, administrative management, personnel management, property management, fiscal and financial management, resident eligibility and service standards, procurement and contracting, construction management, environmental review, records management, compliance review, policy standards, planning, reporting, development, and other relevant functions.
- b. Prepared Indian Housing Plan.
- c. Engaged third-party contractor to perform monthly financial review and conduct annual Self-Monitoring Assessment.
- d. Prepared Annual Performance Report, financial audit, and other monthly, quarterly, and annual funding and activity reports as required.

10.9. Planned and Actual Outputs for 12-Month Program Year

Planned Number of Units To Be Completed in Year Under this Program	Planned Number of Households To Be Served in Year Under this Program	APR: Actual Number of Units Completed in Program Year	APR: Actual Number of Households Served in Program Year
N/A	109	N/A	107

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

Fewer units/families were served than planned because it was found that two had become eligible for conveyance prior to the beginning of the period.

NOTE: Remember to complete all the text boxes in Section 4 for each IHBG-funded program. If you are completing an electronic version of this form, you may copy and paste text boxes 1.1 through 1.10 as needed to describe each of your programs. If you are completing this form in hard copy, you may photocopy Section 4 as needed to describe each of your programs.

SECTION 5: 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 five full-time employees 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.

Roofing rehabilitation for CIHA's 1937 Housing Act units is a priority need. Indian Housing Block Grant funds are insufficient to perform the work. Additional resources are being sought.

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 for 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 6: BUDGETS

- (1) **Planned Grant-Based Budget for Eligible Programs** (In the table below show how you plan to spend the total amount of that year's IHBG funds based on the estimated formula allocation or the final formula allocation. This table should include only planned IHBG funds and not program income or funding from any other source.)

Eligible Activity	Planned IHBG Budget
Indian Housing Assistance	\$ 468,116
Development	0
Housing Services	170,000
Housing Management Services	150,000
Crime Prevention and Safety Activities	30,500
Model Activities	0
Administration	204,654
TOTAL	\$1,023,270

(2) **Estimated Sources of Funding** (NAHASDA § 102(b)(2)(C)(i)) (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	76,535	1,023,270	1,099,805	1,099,805	0	76,535	1,023,270	1,099,805	911,077	188,728	0
2. IHBG Program Income		185,000	185,000	185,000	0		255,164	255,164	255,164	0	0
3. Title VI											
4. Title VI Program Income											
5. 1937 Act Operating Reserves											
6. Carry Over 1937 Act Funds											
LEVERAGED FUNDS											
7. ICDBG Funds	500,000		500,000	435,000	65,000	500,000		500,000	372,179	127,821	49,189
8. Other Federal Funds							58,583	58,583	48,072	10,511	10,511
9. LIHTC											
10. Non-Federal Funds											
TOTAL	576,535	1,208,270	1,784,805	1,719,805	65,000	576,535	1,337,017	1,913,552	1,586,492	327,060	59,700

Notes:

- 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).**
- Total of Column D should match the total of Column O from the **Uses Table** on the following page.
- Total of Column I should match the Total of Column R from the Uses Table on the following page.**
- For the IHP, describe any estimated leverage in box 4 on page 17. **For the APR, describe actual leverage in box 5 on page 17.**

(3) Uses of Funding (NAHASDA § 102(b)(2)(C)(ii)) (Note that the budget should not exceed the total funds on hand. **Actual expenditures in the APR section are for the 12-month program year.)**

PROGRAM NAME (tie to program names in Section 4 above)	Eligible Activity Number	IHP				APR		
		(L) Prior year IHBG (only) funds to be expended in 12-month program year	(M) Current year IHBG (only) funds to be expended in 12-month program year	(N) Total all other funds to be expended in 12-month program year	(O) Total funds to be expended in 12-month program year (L + M + N)	(P) Total IHBG (only) funds expended in 12-month program year	(Q) Total all other funds expended in 12-month program year	(R) Total funds expended in 12-month program year (P+Q)
Modernization and Rehabilitation of 1937 Housing Act Units	1201.1		25,000	435,000	460,000	4,953	420,251	425,204
Accessibility Modifications to 1937 Housing Act Units	1201.2	46,535	622		47,157	32,836		32,836
Conversion of Rental Units to Homebuyer Units	1201.3		30,000		30,000	10,000		10,000
Operation and Maintenance of 1937 Housing Act units	1202		412,494	92,500	504,994	379,378	129,712	509,090
Tenant Based Rental Assistance	1209.1		146,935		146,935	160,438		160,438
Housing Services	1209.2		23,065		23,065	13,024		13,024
Housing Management Services	1210		150,000	92,500	242,500	71,339	125,452	196,791
Crime Prevention and Safety	1211		30,500		30,500	35,000		35,000
Section 504 Modifications to CIHA Office	1212	30,000			30,000	25,260		25,260
Planning and Administration	1213		204,654		204,654	178,849		178,849
Loan repayment – describe in 4 below								
TOTAL		76,535	1,023,270	620,000	1,719,805	911,077	675,415	1,586,492

Notes:

- a. Total of Column L cannot exceed the IHBG funds from Column A, Row 1 from the Sources Table on the previous page.
- b. Total of Column M cannot exceed the IHBG funds from Column B, Row 1 from the Sources Table on the previous page.
- c. Total of Column N should equal the total from Columns A and B, rows 2-10 from the Sources Table on the previous page.
- d. Total of Column P cannot exceed total received IHBG grant from Column C, Row 1 from the Sources table on the previous page.**
- e. Total of Column Q cannot exceed total of Column H of the Sources Table on the previous page excluding the IHBG funds on row 1.**
- f. Total of Column R should equal total of Column I of the Sources Table on the previous page.**

- (4) 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. This information would be used to ensure timely payment of debt obligations, including public and private financial transactions, should it be necessary to prevent default.*

The Housing Authority has made application to other funding sources for assistance with its planned Roofing Rehabilitation Project. This program associated with this project is "Modernization and Rehabilitation of 1937 Housing Act Units – 1201.1". IHBG funds have been committed as leverage. An ICDBG award was received September 14, 2011. We are awaiting response from two other potential funders.

No loan repayment is planned.

- (5) 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 under the NAHASDA-eligible activity and program associated with this loan.):*

A USDA Rural Development Housing Preservation Grant was received October 21, 2011 in support of the Housing Authority's Roofing Rehabilitation Project.

A larger amount of IHBG funds were carried over from prior fiscal years than initially planned. Additional funds were carried over for the "Accessibility Modifications to 1937 Housing Act Units – 1201.2" program because a unit suitable for conversion did not become available during the prior fiscal period. The planned model activity "Section 504 Modifications to CIHA Office – 1212", which was approved in the FY 2010 IHP and planned for completion in FY 2011, was delayed due to other work priorities. It was begun but not completed during the FY 2012 period and will continue into the FY 2013 period.

No loan repayment was necessary.

SECTION 7: OTHER SUBMISSION ITEMS

- (1) **Useful Life/Affordability Period(s)** (NAHASDA § 205, 24 CFR § 1000.142) *(List all unit types (excluding Mutual Help units) that will be developed or rehabilitated with IHBG funds during the 12 month period, and the anticipated useful life of these units. If you propose to assign some period of time other than the useful life of the units, indicate that affordability period.):*

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:

<u>IHBG Funds Invested</u>	<u>Affordability Period</u>
up to \$5,000	6 months
\$5,001 to \$7,500	1 year
\$7,501 to \$10,000	2 years
\$10,001 to \$12,500	3 years
\$12,501 to \$15,000	4 years
\$15,001 to \$17,500	5 years
\$17,501 to \$20,000	6 years
\$20,001 to \$22,500	7 years
\$22,501 to \$25,000	8 years
\$25,001 to \$27,500	9 years
\$27,501 to \$30,000	10 years
\$30,001 to \$32,500	11 years
\$32,501 to \$35,000	12 years
\$35,001 to \$37,500	13 years
\$37,501 to \$40,000	14 years
\$40,001 to \$42,500	15 years
\$42,501 to \$45,000	16 years
\$45,001 to \$47,500	17 years
\$47,501 to \$50,000	18 years
\$50,001 to \$52,500	19 years
over \$52,500	20 years

- (2) **Model Housing and Over-Income Activities** (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.):*

No over-income activities are planned at this time. One model activity, approved in the FY 2010 IHP, has been added to the FY 2012 One Year Plan.

- (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 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 American Indians and Alaska Natives. Homebuyer programs on Coquille Tribal Lands are available to Coquille Tribal members only.

(4) **Administrative** (NAHASDA § 102(b)(2)(C)(ii), 24 CFR § 1000.238)

Do you intend to use more than 20% of your current grant for Administration? Yes No

If yes, describe why the additional funds are needed for Administration.

(5) **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?

Yes No If no, proceed to Section 8.

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:

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

(6) **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.

Total Expenditures on Affordable Housing Activities for:		
	All AIAN Households	AIAN Households with Incomes 80% or less of Median Income
IHBG funds:	<i>Not Applicable</i>	
Funds from other Sources:		

SECTION 8: INDIAN HOUSING PLAN CERTIFICATION OF COMPLIANCE
 (NAHASDA § 102(b)(2)(D))

This certification is used to ensure 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:


- a. Yes No 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.

(2) In accordance with 24 CFR 1000.328, the recipient receiving less than \$200,000 under FCAS certifies that:

- a. Yes No Not Applicable There are households within its jurisdiction at or below 80 percent of median income.

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


- a. Yes No Not Applicable It 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;
- b. Yes No Not Applicable 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;
- c. Yes No Not Applicable 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; and
- d. Yes No Not Applicable 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.

(4) Recipient:	Coquille Indian Tribe
(5) Authorized Official's Name and Title:	Edward L. Metcalf, Chairman
(6) Authorized Official's Signature:	
(7) Date (MM/DD/YYYY):	06/02/2011

SECTION 9: 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) 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.


(4) Recipient:	Coquille Indian Tribe
(5) Authorized Official's Name and Title:	Edward L. Metcalf, Chairman
(6) Authorized Official's Signature:	
(7) Date (MM/DD/YYYY):	06/02/2011

SECTION 10: TRIBAL WAGE RATE CERTIFICATION
 (NAHASDA §§ 102(b)(2)(D)(vi) and 104(b)(3))

This certification is used to indicate whether for construction activities you will use tribally determined prevailing wage rates or Davis-Bacon wage rates. Check only the applicable boxes 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) 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:

(5) Recipient:	Coquille Indian Tribe
(6) Authorized Official's Name and Title:	Edward L. Metcalf, Chairman
(7) Authorized Official's Signature:	
(8) Date (MM/DD/YYYY):	06/02/2011

SECTION 11: 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 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 No Not Applicable

- (3) Did you complete an annual compliance assessment?

Yes No

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

Below is the full text of the Housing Authority's FY 2012 Self-Monitoring Assessment

September 25, 2012

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 September 25, 2012 covering the program year 2012. 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 utilized the new HUD Office of Native American Programs Monitoring Plan checklists to complete the assessment.

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
Scott Felton, Maintenance Coordinator
Lyman Meade, Projects Coordinator

Debbie Dennis, Administrative Services Coordinator
Dale Herring, Housing Programs Coordinator
Marcy Chytka, Accounting Services Coordinator

Areas Reviewed:

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

Jimmy Willis of JWILLIS INC. (Consultant), an outside consulting firm, interviewed Anne Cook, Executive Director, to review the Authority's IHP and APR compliance. He also reviewed the Authority's files and documents which addressed this area. No concerns or findings were noted.

2. Organization and Structure

The Consultant 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 review, but the following recommendations were noted:

Recommendations**Authority's Policies Should be Addressed**

The Authority's policies are reexamined each year against any new statutory and procedural requirements to insure they are compliant with current HUD rules and regulations. In all areas addressed by this self-monitoring assessment it was noted that procedures are followed that address the Authority's obligation to comply with NAHASDA rules and regulations. However, some policies and procedures could be updated or improved. For example, in the area of procurement, it was noted that while existing procedures are satisfactory and comply with statutory requirements, adoption of the micro purchase process permitted by PIH Notice 2009-14 would expedite the processing of small purchases. In another area – equipment management – procedures exist for proper maintenance of equipment but a formal policy does not. The Authority has drafted, but not yet finalized, new or revised policies in these and other areas. Plans for FY 2013 should include a renewed effort to complete these documents.

Additional Staff Assistance Would Expedite Departments

There is a continuing need for additional administrative staff to provide support to the Maintenance and Projects Departments. Lacking this support creates inherent inefficiencies in the functioning of the Administration, Maintenance, and Projects Departments. Current funding, however, is inadequate for this purpose. It is recommended that, should the opportunity arise to obtain volunteer or reduced rate services, Management consider engaging such assistance in this area. Reassignment of qualified field personnel during periods of reduced maintenance and projects activity might also be considered.

3. Environmental Review

The Consultant interviewed Anne Cook, Executive Director, to review the Authority's environmental review compliance. He also reviewed the Authority's files and documents which addressed this area. No concerns or findings were noted.

4. Other Programs – ICDBG

The Consultant interviewed Anne Cook, Executive Director, to review the Authority's compliance with ICDBG program requirements. He also tested files and documentation for compliance with applicable laws and regulations concerning this area. No concerns or findings were noted.

5. Financial and Fiscal Management

The Consultant interviewed Marcy Chytka, Accounting Services Coordinator, and Anne Cook, Executive Director, to determine present procedures. He reviewed the Authority's records concerning this area and tested accounting transactions for compliance with applicable laws and regulations. No concerns or findings were noted during this review, but the following recommendations were noted:

Recommendations

Calculation of Program Income on the Cash Basis

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 was informed of this requirement and advised to monitor this area should the situation change (i.e. significant change in beginning and ending of year receivables).

PILOT Agreement Should be Revisited

The Authority is compliant with the intent of the local cooperation agreement and exemption of taxation provisions of NAHASDA in that its properties have been exempted from taxation by the local governing body of the jurisdiction in which the housing development is situated (the County) and that it makes payments in lieu of taxes in an amount that meets statutory requirements. However, it makes those payments pro rata to individual service providers rather than to the County. This arrangement was established at the time of the initial development of the Authority's 1937 Housing Act units. A subsequent attempt to change this payment method was unsuccessful. Given the length of time since the last request, it is recommended that the Authority contact the County again to discuss changing its payment process.

6. Procurement and Contract Administration

The Consultant interviewed Debbie Dennis, Administrative Services Coordinator, and Scott Felton, Maintenance Coordinator, to determine present procedures. He also tested files for compliance with applicable laws and regulations concerning this area. No concerns or findings were noted during the review of these functions, but the following recommendation was noted:

Recommendation

Adoption of Micro Purchase Threshold

The Authority's policy requires that goods or services with a value of over \$2,500 and less than \$100,000 be competitively procured. This competition should include at least three quotes. In review of invoices over \$2,500, one item had only one price quote in the file. The Maintenance Coordinator was able to find another quote he had obtained for the product that had not been filed, but said he had been unable to get a third quote. From the testing the Consultant performed, it appears this was an isolated instance of noncompliance with Authority policy and therefore is not considered a systemic problem.

In fact, the Authority's buying procedures, regardless of policy, considers all purchases of goods and services as an area where strict due diligence should be practiced to get the best product at the least cost. Therefore, frequently, more than one quote is obtained for purchases that cost less than \$2,500 if it is considered prudent to do so. In the last self-monitoring engagement, the suggestion was made to adopt the micro purchase process permitted by PIH Notice 2009-14. If this had been done, this instance would not have been an exception. Again, it is recommended that consideration be given to formally adopting this purchasing threshold.

7. Labor Standards and Construction Management

The Consultant interviewed Debbie Dennis, Administrative Services Coordinator, to determine present procedures. He also tested files for compliance with applicable laws and regulations concerning this area. No concerns or findings were noted.

8. Relocation and Real Property Acquisition

The Consultant interviewed Dale Herring, Housing Programs Coordinator, and Anne Cook, Executive Director, to review the Authority's compliance with relocation and property acquisition requirements. He also reviewed the Authority's files and documents which addressed this area. No concerns or findings were noted.

9. Lead-Based Paint

The Consultant interviewed Dale Herring, Housing Programs Coordinator, to determine present procedures. He also tested files for compliance with applicable laws and regulations concerning this area. No findings, but one concern was noted during the review of this area:

Concern

All of the homes on the Tribe's reservation were built after 1978; therefore there are no lead-based paint issues with the properties. The homes rented by participants in the Authority's tenant-based rental assistance program (MHAP), however, are off the reservation and could have been built before 1978. The Authority has always, therefore, provided information regarding lead poisoning prevention to MHAP program participants and required landlords to certify that lead-based paint is not an issue for the homes they are leasing under the program.

Strict interpretation of HUD regulations, verified by the Authority's attorney, require the Authority to take additional steps beyond its current procedures if the unit is to be rented to tenants who either expect to have or have children less than six years of age in the household. If this is the case, the Authority must determine whether the house was built before 1978 and whether it has lead-based paint issues independent of the landlord's declaration.

Authority staff is currently addressing this issue. Staff is researching files to determine if there are children under the age of six years old living in rentals that are in the program. If the files reveal that there are, the next step is to determine through appropriate county records whether the homes they are living in were built before 1978. If both of these conditions exist, appropriate measures will be taken to insure that the homes do not have lead-based paint issues. This step will likely entail obtaining the services of a qualified inspector to determine if there is a lead-based paint issue in the unit. If the inspector determines that such a situation exists, the occupants will be advised of the situation immediately. The landlord will then be advised that he must complete procedures to correct the lead-based paint issue. Federal assistance to such a unit will terminate within a reasonable period of time that allows the tenants to find other housing if the landlord fails to take appropriate remedial action.

10. Section 504 Accessibility

The Consultant interviewed Lyman Meade, Projects Coordinator, and Anne Cook, Executive Director, regarding the Authority's progress toward meeting its Section 504 compliance goals. In prior self-monitoring engagements, it was noted that the Authority has issues with respect to its conformity with Section 504 accessibility rules. A legal review revealed that in the initial development of the reservation units in the mid-1990s, the Authority did not construct the required number of accessible units.

During the current fiscal year, the Authority converted one of its units to make it compliant with Section 504 requirements. During review of this unit, it was noted that one of the walk-in closets that was added to the accessible bedroom was 59 ¾" instead of the required 60" mandated by UFAS section 4.1 – 4.2.6. There is a relatively inexpensive solution to the issue involving replacing one wall with ¼" wall board, but the current tenants prefer that the Authority not perform the required modification at this time.

Other units were reviewed for conversion as well, but the estimated cost exceeded available funding. It is the Authority's plan to work toward full compliance as funds become available. In the interim, in accordance with 24 CFR 8.4(b) (1), other actions will be taken to insure residents with needs under the Act receive specific modifications to their units as necessary.

Also in the current period, accessibility modifications were made to the Authority's administrative office. During inspection of the restroom, it was noted that the clearance in front of the toilet was out of compliance by 3". In reviewing the plans for the project, it was found that the architect had specified the proper distance. However, the fixture had not been installed to plan by the construction contractor because of a steel support beam that runs under the floor obstructing the installation of plumbing in that area. Staff is investigating possible solutions. This issue has been noted for follow up next year.

11. Maintenance and Inspection

The Consultant interviewed Scott Felton, Maintenance Coordinator, to determine present procedures. He also performed physical inspections of five randomly selected rental units and reviewed the Authority's maintenance and inspection records for compliance with CIHA policies and procedures and the laws and regulations governing this area. No concerns or findings were noted. However, as stated in the Organization and Structure section, additional administrative support would be helpful in this area.

12. IHBG Self-Monitoring

The Consultant interviewed Anne Cook, Executive Director, to review the Authority's self-monitoring program. It was agreed that the new monitoring plans for recipients published by HUD in January 2012 would be used for this year's monitoring. In the course of this review, the following recommendation was noted:

Recommendation

Self-Monitoring Mutual Agreement Application

It was observed that the Authority appears to be qualified to enter into a Self-Monitoring Mutual Agreement (SMMA) with the HUD Office of Native American Programs (ONAP). The Authority has not been monitored for over five years, which is the maximum allowed without such an agreement. It is recommended that the Authority contact Northwest ONAP to inquire about application.

13. Admissions and Occupancy

The Consultant interviewed Dale Herring, Housing Programs Coordinator, to determine present procedures. He also reviewed participant files to determine the extent of compliance with CIHA policies and procedures and the laws and regulations governing this area. No concerns or findings were noted. Testing in this area during self-monitoring was limited as the Authority's auditor had recently examined $\frac{1}{3}$ of the files in each program category and found no exceptions. Results of the self-monitoring tests concurred with the conclusion of the auditor that there were no systemic problems in this area.

14. Subrecipient Agreements

The Authority has no subrecipient agreements.

CONCLUSION

JWILLIS INC. and the Monitoring Committee concur that the IHBG program is well managed and substantially in compliance with the requirements of NAHASDA. There are two special items of interest that should be noted. The first is the Authority's continued exceptional control over resident receivables. In the current fiscal year, the amount of tenant accounts receivable (TARS) actually *decreased* from last year's amount of .06% to 0%. This is an outstanding achievement in Indian Country. The second is the award the organization recently received from Oregon Business magazine for earning 2nd place in the 2012 100 Best Nonprofits to Work for in Oregon small nonprofits category. This award is an affirmation of the Authority's commitment to excellence in all aspects of its performance.

CIHA should consider any recommended improvements provided by JWILLIS INC. and the Committee and address the one item of concern noted during the self-monitoring. JWILLIS INC. and the Committee thank all who participated for their cooperation and assistance in completing the annual compliance assessment.

Respectfully submitted,

JWILLIS INC. and the Monitoring Committee

SECTION 12: 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	(C) Units in standard condition	(D) Units needing rehabilitation	(E) Units needing to be replaced	(F) Total number of units inspected
1.	1937 Housing Act Units:					
	a. Rental	50	38	12	0	50
	b. Homeownership	16	16	0	0	16
	c. Other – Section 8	19	19	0	0	19
1937 Act Subtotal		85	73	12	0	85
2.	NAHASDA Units:					
	a. Rental	4	4	0	0	4
	b. Homeownership	2	2	0	0	2
	c. Rental Assistance	16	16	0	0	16
	d. Other					
NAHASDA Subtotal		22	22	0	0	22
Total		107	95	12	0	107

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 13: AUDITS

If you expended less than \$500,000 in total Federal awards during the fiscal year ended and, on that basis, claim that a financial audit is not required for that fiscal year, the authorized official should sign the following certification.

During the previous fiscal year ended, the recipient expended less than \$500,000 in Federal awards, as that term is defined in the Single Audit Act of 1984, 31 U.S.C. § 7501(a)(4) and in Office of Management and Budget Circular A-133, § ____.105. This certification is based on a review of the recipient's financial records.

(1) Recipient:	<i>Not Applicable</i>
(2) Authorized Official's Name and Title:	
(3) Authorized Official's Signature:	
(4) Date (MM/DD/YYYY):	

SECTION 14: PUBLIC ACCOUNTABILITY

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

Yes No

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

Yes 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)):

No comments were received.

SECTION 15: JOBS SUPPORTED BY NAHASDA

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

Indian Housing Block Grant Assistance (IHBG)	
(1) Number of Permanent Jobs Supported	10
(2) Number of Temporary Jobs Supported	3
(3) Narrative (optional):	

SECTION 16: IHP WAIVER REQUESTS

(NAHASDA § 101(b)(2))

THIS SECTION IS ONLY REQUIRED IF THE RECIPIENT IS REQUESTING A WAIVER OF AN IHP SECTION OR A WAIVER OF THE IHP SUBMISSION DUE DATE. Fill out the form below if you are requesting a waiver of one or more sections of the IHP. **NOTE:** This is NOT a waiver of the IHBG program requirements but rather a request to waive some of the IHP submission items.

- (1) List below the sections of the IHP where you are requesting a waiver and/or a waiver of the IHP due date (*List the requested waiver sections by name and section number.*):

- (2) Describe the reasons that you are requesting this waiver (*Describe completely why you are unable to complete a particular section of the IHP.*):

- (3) Describe the actions that you will take in order to ensure that you are able to submit a complete IHP in the future and/or submit the IHP by the required due date (*This section should completely describe the procedural, staffing or technical corrections that you will make in order to submit a complete IHP in the future and/or submit the IHP by the required due date.*):



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