



## Confirmation

Thank you for submitting your grant application package via Grants.gov. Your application is currently being processed by the Grants.gov system. Once your submission has been processed, Grants.gov will send email messages to advise you of the progress of your application through the system. Over the next 24 to 48 hours, you should receive two emails. The first will confirm receipt of your application by the Grants.gov system, and the second will indicate that the application has either been successfully validated by the system prior to transmission to the grantor agency or has been rejected due to errors.

Please do not hit the back button on your browser.

If your application is successfully validated and subsequently retrieved by the grantor agency from the Grants.gov system, you will receive an additional email. This email may be delivered several days or weeks from the date of submission, depending on when the grantor agency retrieves it.

You may also monitor the processing status of your submission within the Grants.gov system by clicking on the "Track My Application" link listed at the end of this form.

Note: Once the grantor agency has retrieved your application from Grants.gov, you will need to contact them directly for any subsequent status updates. Grants.gov does not participate in making any award decisions.

**IMPORTANT NOTICE:** If you do not receive a receipt confirmation and either a validation confirmation or a rejection email message within 48 hours, please contact us. The Grants.gov Contact Center can be reached by email at [support@grants.gov](mailto:support@grants.gov), or by telephone at 1-800-518-4726. Always include your Grants.gov tracking number in all correspondence. The tracking numbers issued by Grants.gov look like GRANTXXXXXXXXX.

If you have questions please contact the Grants.gov Contact Center: [support@grants.gov](mailto:support@grants.gov)  
1-800-518-4726 24 hours a day, 7 days a week. Closed on federal holidays.

The following application tracking information was generated by the system:

<b>Grants.gov Tracking Number:</b>	GRANT12915265
<b>Applicant DUNS:</b>	94-421-2935
<b>Submitter's Name:</b>	Anne Cook
<b>CFDA Number:</b>	14.867
<b>CFDA Description:</b>	Indian Housing Block Grants
<b>Funding Opportunity Number:</b>	FR-6300-N-48
<b>Funding Opportunity Description:</b>	Indian Housing Block Grant (IHBG) Program--Competitive Grants
<b>Agency Name:</b>	US Department of Housing and Urban Development
<b>Application Name of this Submission:</b>	Coquille Indian Housing Authority
<b>Date/Time of Receipt:</b>	Aug 05, 2019 07:41:30 PM EDT

TRACK MY APPLICATION – To check the status of this application, please click the link below:

[https://apply07.grants.gov/apply/spoExit.jsp?p=web/grants/applicants/track-my-application.html&tracking\\_num=GRANT12915265](https://apply07.grants.gov/apply/spoExit.jsp?p=web/grants/applicants/track-my-application.html&tracking_num=GRANT12915265)

It is suggested you Save and/or Print this response for your records.

CIHA 2019 IHBG Competitive Grants Program

Workspace ID# WS00350353

This Workspace form is one of the forms you need to complete prior to submitting your Application Package. This form can be completed in its entirety offline using Adobe Reader. You can save your form by clicking the "Save" button and see any errors by clicking the "Check For Errors" button. In-progress and completed forms can be uploaded at any time to Grants.gov using the Workspace feature.

When you open a form, required fields are highlighted in yellow with a red border. Optional fields and completed fields are displayed in white. If you enter invalid or incomplete information in a field, you will receive an error message. Additional instructions and FAQs about the Application Package can be found in the Grants.gov Applicants tab.

**OPPORTUNITY & PACKAGE DETAILS:**

Opportunity Number:	FR-6300-N-48
Opportunity Title:	Indian Housing Block Grant (IHBG) Program--Competitive Grants
Opportunity Package ID:	PKG00250769
CFDA Number:	14.867
CFDA Description:	Indian Housing Block Grants
Competition ID:	FR-6300-N-48
Competition Title:	Indian Housing Block Grant (IHBG) Program--Competitive Grants
Opening Date:	05/07/2019
Closing Date:	08/08/2019
Agency:	Department of Housing and Urban Development
Contact Information:	IHBGCompetitiveProgram@hud.gov

**APPLICANT & WORKSPACE DETAILS:**

Workspace ID:	WS00350353
Application Filing Name:	Coquille Indian Housing Authority
DUNS:	9442129350000
Organization:	COQUILLE INDIAN HOUSING AUTHORITY
Form Name:	Application for Federal Assistance (SF-424)
Form Version:	2.1
Requirement:	Mandatory
Download Date/Time:	Aug 05, 2019 05:04:18 PM EDT
Form State:	No Errors

**FORM ACTIONS:**

## Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

Completed by Grants.gov upon submission.

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

Coquille Indian Housing Authority

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

93-1133051

**\* c. Organizational DUNS:**

9442129350000

**d. Address:**

**\* Street1:**

2678 Mexeye Loop

**Street2:**

**\* City:**

Coos Bay

**County/Parish:**

Coos

**\* State:**

OR: Oregon

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

97420-7713

**e. Organizational Unit:**

**Department Name:**

**Division Name:**

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

**\* First Name:**

Anne

**Middle Name:**

**\* Last Name:**

Cook

**Suffix:**

**Title:**

Executive Director

**Organizational Affiliation:**

Coquille Indian Housing Authority

**\* Telephone Number:**

541-888-6501

**Fax Number:**

**\* Email:**

annecook@coquilleiha.org

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

K: Indian/Native American Tribally Designated Organization

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.867

CFDA Title:

Indian Housing Block Grants

### \* 12. Funding Opportunity Number:

FR-6300-N-48

\* Title:

Indian Housing Block Grant (IHBG) Program--Competitive Grants

### 13. Competition Identification Number:

FR-6300-N-48

Title:

Indian Housing Block Grant (IHBG) Program--Competitive Grants

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

The Kilkich Accessible Housing Construction and Rehabilitation Project

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,274,985.00"/>
* b. Applicant	<input type="text" value="425,000.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="1,699,985.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed:

This Workspace form is one of the forms you need to complete prior to submitting your Application Package. This form can be completed in its entirety offline using Adobe Reader. You can save your form by clicking the "Save" button and see any errors by clicking the "Check For Errors" button. In-progress and completed forms can be uploaded at any time to Grants.gov using the Workspace feature.

When you open a form, required fields are highlighted in yellow with a red border. Optional fields and completed fields are displayed in white. If you enter invalid or incomplete information in a field, you will receive an error message. Additional instructions and FAQs about the Application Package can be found in the Grants.gov Applicants tab.

**OPPORTUNITY & PACKAGE DETAILS:**

Opportunity Number:	FR-6300-N-48
Opportunity Title:	Indian Housing Block Grant (IHBG) Program--Competitive Grants
Opportunity Package ID:	PKG00250769
CFDA Number:	14.867
CFDA Description:	Indian Housing Block Grants
Competition ID:	FR-6300-N-48
Competition Title:	Indian Housing Block Grant (IHBG) Program--Competitive Grants
Opening Date:	05/07/2019
Closing Date:	08/08/2019
Agency:	Department of Housing and Urban Development
Contact Information:	IHBGCompetitiveProgram@hud.gov

**APPLICANT & WORKSPACE DETAILS:**

Workspace ID:	WS00350353
Application Filing Name:	Coquille Indian Housing Authority
DUNS:	9442129350000
Organization:	COQUILLE INDIAN HOUSING AUTHORITY
Form Name:	HUD Applicant-Recipient Disclosure Report
Form Version:	1.1
Requirement:	Mandatory
Download Date/Time:	Aug 03, 2019 02:51:25 PM EDT
Form State:	No Errors

**FORM ACTIONS:**

# Applicant/Recipient Disclosure/Update Report

U.S. Department of Housing  
and Urban Development

OMB Number: 2510-0011  
Expiration Date: 01/31/2019

## Applicant/Recipient Information

\* Duns Number: 9442129350000

\* Report Type: INITIAL

### 1. Applicant/Recipient Name, Address, and Phone (include area code):

#### \* Applicant Name:

Coquille Indian Housing Authority

\* Street1: 2678 Mexeye Loop

Street2:

\* City: Coos Bay

County: Coos

\* State: OR: Oregon

\* Zip Code: 97420-7713

\* Country: USA: UNITED STATES

\* Phone: 541-888-6501

### 2. Social Security Number or Employer ID Number: 93-1133051

### \* 3. HUD Program Name:

Indian Housing Block Grants

### \* 4. Amount of HUD Assistance Requested/Received: \$ 1,274,985.00

### 5. State the name and location (street address, City and State) of the project or activity:

\* Project Name: The Kilkich Accessible Housing Construction and Rehabilitati

\* Street1: 2678 Mexeye Loop

Street2:

\* City: Coos Bay

County:

\* State: OR: Oregon

\* Zip Code: 97420-7713

\* Country: USA: UNITED STATES

## Part I Threshold Determinations

\* 1. Are you applying for assistance for a specific project or activity? These terms do not include formula grants, such as public housing operating subsidy or CDBG block grants. (For further information see 24 CFR Sec. 4.3).

☒ Yes ☐ No

\* 2. Have you received or do you expect to receive assistance within the jurisdiction of the Department (HUD), involving the project or activity in this application, in excess of \$200,000 during this fiscal year (Oct. 1-Sep. 30)? For further information, see 24 CFR Sec. 4.9

☐ Yes ☒ No

If you answered " No " to either question 1 or 2, **Stop!** You do not need to complete the remainder of this form.

**However,** you must sign the certification at the end of the report.

---

**Part II Other Government Assistance Provided or Requested / Expected Sources and Use of Funds.**

Such assistance includes, but is not limited to, any grant, loan, subsidy, guarantee, insurance, payment, credit, or tax benefit.

---

Department/State/Local Agency Name:

\* Government Agency Name:

Government Agency Address:

\* Street1:

Street2:

\* City:

County:

\* State:

\* Zip Code:

\* Country:

\* Type of Assistance:

\* Amount Requested/Provided: \$

\* Expected Uses of the Funds:

---

Department/State/Local Agency Name:

\* Government Agency Name:

Government Agency Address:

\* Street1:

Street2:

\* City:

County:

\* State:

\* Zip Code:

\* Country:

\* Type of Assistance:

\* Amount Requested/Provided: \$

\* Expected Uses of the Funds:

---

(Note: Use Additional pages if necessary.)

Add Attachment

Delete Attachment

View Attachment

---

**Part III Interested Parties. You must disclose:**

**1. All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity and**

**2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds \$50,000 or 10 percent of the assistance (whichever is lower).**

* Alphabetical list of all persons with a reportable financial interest in the project or activity (For individuals, give the last name first)	* Social Security No. or Employee ID No.	* Type of Participation in Project/Activity	* Financial Interest in Project/Activity (\$ and %)
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %

(Note: Use Additional pages if necessary.)

Add Attachment

Delete Attachment

View Attachment

**Certification**

**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 disclosures of information, including intentional non-disclosure, is subject to civil money penalty not to exceed \$10,000 for each violation. I certify that this information is true and complete.

\* Signature:

\* Date: (mm/dd/yyyy)

Completed Upon Submission to Grants.gov

Completed Upon Submission  
to Grants.gov

The Kilkich Accessible Housing Construction and Rehabilitation Project

REHABILITATION PROJECT

Implementation Schedule

# Implementation Schedule

## Indian Housing Block Grant

**NOTE:** This form is intended for use only by awardees of competitive IHBG funds.

## U.S. Department of Housing and Urban Development Office of Public and Indian Housing

OMB Approval No. 2577-0218  
(exp. 08/31/2019)

See Instructions and Public Reporting Statement on back.

Submit a separate implementation schedule for each project category.

1. Name of Applicant (as shown in Item 5, Standard Form 424)  <b>Coquille Indian Housing Authority</b>	2. Application/Grant Number (to be assigned by HUD)	3. <input checked="" type="checkbox"/> Original (First submission to HUD) <input type="checkbox"/> Pre-Award Submission <input type="checkbox"/> Amendment (submitted after grant approval)	Date (mm/dd/yyyy)  <b>08/03/2019</b>
4. Project Name & Project Category <b>Kilkich Accessible Housing...Rehab Project</b>	5. Period of Performance Start Date (mm/dd/yyyy) <b>01/01/2020</b> End Date (mm/dd/yyyy) <b>12/31/2020</b>		Expected Close Out Date (mm/dd/yyyy) <b>01/31/2022</b>
6. Environmental Review Status <input type="checkbox"/> <b>Exempt</b> (As described in 24 CFR 58.34) <input type="checkbox"/> <b>Under Review</b> (Review underway; findings not yet made) <input type="checkbox"/> <b>Finding of No Significant Impact</b> (Finding made that request for release of funds for project is not an action which may significantly affect the environment.)  <input type="checkbox"/> <b>EIS Required</b> (Finding that project may significantly affect environment or EIS automatically required by 24 CFR 58.37) <input checked="" type="checkbox"/> <b>Not Started</b> (Review not yet begun) <input type="checkbox"/> <b>Certification</b> (Environmental review completed; certification and request for release of funds being prepared for submission.) <input type="checkbox"/> <b>Categorically Excluded</b> (as described in 24 CFR 58.35)			7. Tribal Fiscal Year (mm/dd/yyyy)  <b>10/01/2019</b>

8. Task List		9. Schedule.																																																																																									
(List tasks such as environmental assessment, acquisition, etc.)		Use Calendar Year (CY) quarters. Fill-in the CY below. See detailed instructions on back.																																																																																									
		CY 2019										CY 2020										Date (mm/dd/yyyy) (If exceeds 8th Q tr																																																																					
		1st Qtr.			2nd Qtr.			3rd Qtr.			4th Qtr.			5th Qtr.			6th Qtr.			7th Qtr.			8th Qtr.																																																																				
Assemble Development Team						X																																																																																					
Complete Preliminary Project Plan and Logistics Stra						X	X	X																																																																																			
Conduct Preliminary Environmental Review						X	X																																																																																				
Prepare Preliminary Design and Budget						X	X																																																																																				
Secure Leveraged Funds and Submit Application						X	X	X																																																																																			
Conduct Environmental Review														X	X																																																																												
Complete Schematic Design														X	X																																																																												
Energy Trust of Oregon: Review and Recommend.														X	X																																																																												
Design Development: Site Plan, A&E Design, Materia															X	X																																																																											
Procurement Process: Section 3 and Indian Owned																X	X																																																																										
Value Engineering (if necessary)																		X																																																																									
10. Planned Drawdowns by Quarter (Enter amounts non-cumulatively)		Drawdowns A										Drawdowns B										Drawdowns C										Drawdowns D										Drawdowns E										Drawdowns F										Drawdowns G										Drawdowns H										Total									
11. Cumulative Drawdown (If more than one page, enter total on last page only)		0.00										0.00										0.00										0.00										0.00										0.00										0.00										0.00										Total									

# Implementation Schedule

## Indian Housing Block Grant

**NOTE:** This form is intended for use only by awardees of competitive IHBG funds.

## U.S. Department of Housing and Urban Development Office of Public and Indian Housing

OMB Approval No. 2577-0218  
(exp. 08/31/2019)

See Instructions and Public Reporting Statement on back.

Submit a separate implementation schedule for each project category.

1. Name of Applicant (as shown in Item 5, Standard Form 424)  <b>Coquille Indian Housing Authority</b>	2. Application/Grant Number (to be assigned by HUD)	3. <input checked="" type="checkbox"/> Original (First submission to HUD) <input type="checkbox"/> Pre-Award Submission <input type="checkbox"/> Amendment (submitted after grant approval)	Date (mm/dd/yyyy)  <b>08/03/2019</b>
4. Project Name & Project Category <b>Kilkich Accessible Housing...Rehab Project</b>	5. Period of Performance Start Date (mm/dd/yyyy)      End Date (mm/dd/yyyy) <div style="display: flex; justify-content: space-around;"> <span><b>01/01/2020</b></span> <span><b>12/31/2020</b></span> </div>		Expected Close Out Date (mm/dd/yyyy)  <b>01/31/2022</b>
6. Environmental Review Status <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> <b>Exempt</b> (As described in 24 CFR 58.34)   <input type="checkbox"/> <b>EIS Required</b> (Finding that project may significantly affect environment or EIS automatically required by 24 CFR 58.37)         </div> <div> <input type="checkbox"/> <b>Under Review</b> (Review underway; findings not yet made)   <input checked="" type="checkbox"/> <b>Not Started</b> (Review not yet begun)         </div> <div> <input type="checkbox"/> <b>Finding of No Significant Impact</b> (Finding made that request for release of funds for project is not an action which may significantly affect the environment.)   <input type="checkbox"/> <b>Certification</b> (Environmental review completed; certification and request for release of funds being prepared for submission.)         </div> <div> <input type="checkbox"/> <b>Categorically Excluded</b> (as described in 24 CFR 58.35)         </div> </div>			7. Tribal Fiscal Year (mm/dd/yyyy)  <b>10/01/2019</b>

8. Task List	9. Schedule																
(List tasks such as environmental assessment, acquisition, etc.) Use Calendar Year (CY) quarters. Fill-in the CY below. See detailed instructions on back.																	
	CY 2019								CY 2020								Date (mm/dd/yyyy) (If exceeds 8th Q tr
	1st Qtr.		2nd Qtr.		3rd Qtr.		4th Qtr.		5th Qtr.		6th Qtr.		7th Qtr.		8th Qtr.		
Obtain Liability and Builders Risk Insurance																	
Obtain Permits																	
Update Capital Budget																	
Conduct Background Checks and Prepare to Execute																	
Conduct Pre-Construction Conference																	
Approve Work Schedule, Drawings, Products, and Su																	
Site Prep																	
Construction																	
Monitor and Inspect Work in Progress																	
Respond to Contractor's Requests																	
Conduct Progress Meetings, Prepare Progress Repo																	
10. Planned Drawdowns by Quarter (Enter amounts non-cumulatively)	Drawdowns Are Provided on the Final Page of the Implementation Schedule																\$Total
11. Cumulative Drawdown (If more than one page, enter total on last page only)	\$ 0.00		\$ 0.00		\$ 0.00		\$ 0.00		\$ 0.00		\$ 0.00		\$ 0.00		\$ 0.00		\$Total 0.00

# Implementation Schedule

## Indian Housing Block Grant

**NOTE:** This form is intended for use only by awardees of competitive IHBG funds.

## U.S. Department of Housing and Urban Development Office of Public and Indian Housing

OMB Approval No. 2577-0218  
(exp. 08/31/2019)

See Instructions and Public Reporting Statement on back.

Submit a separate implementation schedule for each project category.

1. Name of Applicant (as shown in Item 5, Standard Form 424)  <b>Coquille Indian Housing Authority</b>				2. Application/Grant Number (to be assigned by HUD)				3. <input checked="" type="checkbox"/> Original (First submission to HUD) <input type="checkbox"/> Pre-Award Submission <input type="checkbox"/> Amendment (submitted after grant approval)				Date (mm/dd/yyyy)  <b>08/03/2019</b>													
4. Project Name & Project Category <b>Kilkich Accessible Housing...Rehab Project</b>				5. Period of Performance Start Date (mm/dd/yyyy) <b>01/01/2020</b>				Period of Performance End Date (mm/dd/yyyy) <b>12/31/2020</b>				Expected Close Out Date (mm/dd/yyyy) <b>01/31/2022</b>													
6. Environmental Review Status																7. Tribal Fiscal Year (mm/dd/yyyy)									
<input type="checkbox"/> <b>Exempt</b> (As described in 24 CFR 58.34) <input type="checkbox"/> <b>Under Review</b> (Review underway; findings not yet made) <input type="checkbox"/> <b>Finding of No Significant Impact</b> (Finding made that request for release of funds for project is not an action which may significantly affect the environment.)  <input type="checkbox"/> <b>EIS Required</b> (Finding that project may significantly affect environment or EIS automatically required by 24 CFR 58.37) <input checked="" type="checkbox"/> <b>Not Started</b> (Review not yet begun) <input type="checkbox"/> <b>Certification</b> (Environmental review completed; certification and request for release of funds being prepared for submission.) <input type="checkbox"/> <b>Categorically Excluded</b> (as described in 24 CFR 58.35)																<b>10/01/2019</b>									
8. Task List (List tasks such as environmental assessment, acquisition, etc.)				9. Schedule. Use Calendar Year (CY) quarters. Fill-in the CY below. See detailed instructions on back.																					
				CY <u>2019</u>								CY <u>2020</u>				Date (mm/dd/yyyy) (If exceeds 8th Q tr									
				1st Qtr.		2nd Qtr.		3rd Qtr.		4th Qtr.		5th Qtr.		6th Qtr.		7th Qtr.		8th Qtr.							
Conduct Tours and Demonstrations  Complete Landscaping  Tenant Selection  Update Property Insurance  Ensure All As-Builts, Manuals, Warranties, and Docu  Establish Maintenance Schedule and Warranty Requ  Tenant Move In  Complete All Grant Reports																		x		x					
																				x		x			
																						x			
																						x			
																						x			
																						x			
																						x			
																						x			
10. Planned Drawdowns by Quarter (Enter amounts non-cumulatively)				\$		\$		\$		\$		\$ 35,000.00		\$ 40,000.00		\$ 225,000.00		\$ 318,975.00		\$Total 618,975.00					
11. Cumulative Drawdown (If more than one page, enter total on last page only)				\$ 0.00		\$ 0.00		\$ 0.00		\$ 0.00		\$ 35,000.00		\$ 75,000.00		\$ 300,000.00		\$ 618,975.00		\$Total 618,975.00					

The Kilkich Accessible Housing Construction and Rehabilitation Project

NEW CONSTRUCTION PROJECT

Implementation Schedule

# Implementation Schedule

**NOTE:** This form is intended for use only by awardees of competitive IHBG funds.

**U.S. Department of Housing  
and Urban Development**  
Office of Public and Indian Housing

OMB Approval # 2530-0213  
(exp. 08/31/2019)

See Instructions and Public Reporting Statement on back.  
Submit a separate implementation schedule for each project category.

1. Name of Applicant (as shown in Item 5, Standard Form 424) <b>Coquille Indian Housing Authority</b>				2. Application/Grant Number (to be assigned by HUD)				3. <input checked="" type="checkbox"/> Original (First submission to HUD) <input type="checkbox"/> Pre-Award Submission <input type="checkbox"/> Amendment (submitted after grant approval)				Date (mm/dd/yyyy) <b>08/03/2019</b>							
4. Project Name & Project Category <b>Kilkich Accessible Housing...New Construction Project</b>				5. Period of Performance Start Date (mm/dd/yyyy) <b>01/01/2020</b>				Period of Performance End Date (mm/dd/yyyy) <b>12/31/2021</b>				Expected Close Out Date (mm/dd/yyyy) <b>01/31/2022</b>							
6. Environmental Review Status												7. Tribal Fiscal Year (mm/dd/yyyy)							
<input type="checkbox"/> <b>Exempt</b> (As described in 24 CFR 58.34) <input type="checkbox"/> <b>Under Review</b> (Review underway; findings not yet made) <input type="checkbox"/> <b>Finding of No Significant Impact</b> (Finding made that request for release of funds for project is not an action which may significantly affect the environment.) <input type="checkbox"/> <b>EIS Required</b> (Finding that project may significantly affect environment or EIS automatically required by 24 CFR 58.37) <input checked="" type="checkbox"/> <b>Not Started</b> (Review not yet begun) <input type="checkbox"/> <b>Certification</b> (Environmental review completed; certification and request for release of funds being prepared for submission.) <input type="checkbox"/> <b>Categorically Excluded</b> (as described in 24 CFR 58.35)												<b>10/01/2019</b>							
8. Task List (List tasks such as environmental assessment, acquisition, etc.)				9. Schedule. Use Calendar Year (CY) quarters. Fill-in the CY below. See detailed instructions on back.															
				<div style="display: flex; justify-content: space-around;"> <span>cy <u>2020</u></span> <span>cy <u>2021</u></span> </div>								Date (mm/dd/yyyy) (If exceeds 8th Q tr)							
				1st Qtr.		2nd Qtr.		3rd Qtr.		4th Qtr.		5th Qtr.		6th Qtr.		7th Qtr.		8th Qtr.	
Conduct Environmental Review				x															
Complete Schematic Design										x x									
Energy Trust of Oregon: Review and Recommend.										x x									
Design Development: Site Plan, A&E Design, Material										x x									
Procurement Process: Section 3 and Indian Owned												x x							
Value Engineering (if necessary)												x							
Obtain Liability and Builders Risk Insurance												x							
Obtain Permits												x							
Update Capital Budget												x							
Conduct Background Checks, Prepare to Execute Co												x x							
Conduct Pre-Construction Conference												x							
10. Planned Drawdowns by Quarter (Enter amounts non-cumulatively)				\$		\$		\$		\$		\$		\$		\$		\$	
Drawdowns are Provided on Final Page of Project Implementation Schedule				0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	
11. Cumulative Drawdown (If more than one page, enter total on last page only)				\$		\$		\$		\$		\$		\$		\$		\$	
				0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00	

# Implementation Schedule

## Indian Housing Block Grant

**NOTE:** This form is intended for use only by awardees of competitive IHBG funds.

## U.S. Department of Housing and Urban Development Office of Public and Indian Housing

OMB Approval No. 2577-0218  
(exp. 08/31/2019)

See Instructions and Public Reporting Statement on back.

Submit a separate implementation schedule for each project category.

1. Name of Applicant (as shown in Item 5, Standard Form 424)  <b>Coquille Indian Housing Authority</b>	2. Application/Grant Number (to be assigned by HUD)	3. <input checked="" type="checkbox"/> Original (First submission to HUD) <input type="checkbox"/> Pre-Award Submission <input type="checkbox"/> Amendment (submitted after grant approval)	Date (mm/dd/yyyy)  <b>08/03/2019</b>
4. Project Name & Project Category <b>Kilkich Accessible Housing...New Construction Project</b>	5. Period of Performance Start Date (mm/dd/yyyy) <b>01/01/2020</b> End Date (mm/dd/yyyy) <b>12/31/2021</b>		Expected Close Out Date (mm/dd/yyyy)  <b>01/31/2022</b>
6. Environmental Review Status <input type="checkbox"/> <b>Exempt</b> (As described in 24 CFR 58.34) <input type="checkbox"/> <b>Under Review</b> (Review underway; findings not yet made) <input type="checkbox"/> <b>Finding of No Significant Impact</b> (Finding made that request for release of funds for project is not an action which may significantly affect the environment.)  <input type="checkbox"/> <b>EIS Required</b> (Finding that project may significantly affect environment or EIS automatically required by 24 CFR 58.37) <input checked="" type="checkbox"/> <b>Not Started</b> (Review not yet begun) <input type="checkbox"/> <b>Certification</b> (Environmental review completed; certification and request for release of funds being prepared for submission.) <input type="checkbox"/> <b>Categorically Excluded</b> (as described in 24 CFR 58.35)			7. Tribal Fiscal Year (mm/dd/yyyy)  <b>10/01/2019</b>

8. Task List	9. Schedule																
(List tasks such as environmental assessment, acquisition, etc.) Use Calendar Year (CY) quarters. Fill-in the CY below. See detailed instructions on back.																	
	CY 2020								CY 2021								Date (mm/dd/yyyy) (If exceeds 8th Q tr
	1st Qtr.		2nd Qtr.		3rd Qtr.		4th Qtr.		5th Qtr.		6th Qtr.		7th Qtr.		8th Qtr.		
Approve Work Schedule, Drawings, Products, and Su																	
Site Prep																	
Construction																	
Monitor and Inspect Work in Progress																	
Respond to Contractor Requests																	
Conduct Progress Meetings, Issue Progress Reports,																	
Conduct Tours and Demonstrations																	
Complete Landscaping																	
Tenant Selection																	
Update Property Insurance																	
Ensure All As-Built, Manuals, Warranties, and Docu																	
10. Planned Drawdowns by Quarter (Enter amounts non-cumulatively)	Drawdowns on Final Page of Project Implementation Schedule																\$Total
11. Cumulative Drawdown (If more than one page, enter total on last page only)	0.00		0.00		0.00		0.00		0.00		0.00		0.00		0.00		\$Total

**NOTE:** This form is intended for use only by awardees of competitive IHBG funds.

See Instructions and Public Reporting Statement on back.  
Submit a separate implementation schedule for each project category.

1. Name of Applicant (as shown in Item 5, Standard Form 424)  <b>Coquille Indian Housing Authority</b>				2. Application/Grant Number (to be assigned by HUD)				3. <input checked="" type="checkbox"/> Original (First submission to HUD) <input type="checkbox"/> Pre-Award Submission <input type="checkbox"/> Amendment (submitted after grant approval)				Date (mm/dd/yyyy)  <b>08/03/2019</b>									
4. Project Name & Project Category <b>Kilkich Accessible Housing...New Construction Project</b>				5. Period of Performance Start Date (mm/dd/yyyy)  <b>01/01/2020</b>				Period of Performance End Date (mm/dd/yyyy)  <b>12/31/2021</b>				Expected Close Out Date (mm/dd/yyyy)  <b>01/31/2022</b>									
6. Environmental Review Status <div style="display: flex; justify-content: space-between;"><div><input type="checkbox"/> <b>Exempt</b> (As described in 24 CFR 58.34)</div><div><input type="checkbox"/> <b>Under Review</b> (Review underway; findings not yet made)</div><div><input type="checkbox"/> <b>Finding of No Significant Impact</b> (Finding made that request for release of funds for project is not an action which may significantly affect the environment.)</div></div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"><div><input type="checkbox"/> <b>EIS Required</b> (Finding that project may significantly affect environment or EIS automatically required by 24 CFR 58.37)</div><div><input checked="" type="checkbox"/> <b>Not Started</b> (Review not yet begun)</div><div><input type="checkbox"/> <b>Certification</b> (Environmental review completed; certification and request for release of funds being prepared for submission.)</div><div><input type="checkbox"/> <b>Categorically Excluded</b> (as described in 24 CFR 58.35)</div></div>																7. Tribal Fiscal Year (mm/dd/yyyy)  <b>10/01/2019</b>					
8. Task List (List tasks such as environmental assessment, acquisition, etc.)				9. Schedule. Use Calendar Year (CY) quarters. Fill-in the CY below. See detailed instructions on back.																	
				CY <u>2020</u>						CY <u>2021</u>						Date (mm/dd/yyyy) (If exceeds 8th Q. tr					
				1st Qtr.		2nd Qtr.		3rd Qtr.		4th Qtr.		5th Qtr.		6th Qtr.				7th Qtr.		8th Qtr.	
Establish Maintenance Schedules and Warranty Req  Tenant Move In  Final Grant Reports Submitted  Project Closed																					
10. Planned Drawdowns by Quarter (Enter amounts non-cumulatively)				\$	5,000.00	\$	1,000.00	\$	1,000.00	\$	45,000.00	\$	30,000.00	\$	400,000.00	\$	550,000.00	\$	49,000.00	\$Total	1,081,000.
11. Cumulative Drawdown (If more than one page, enter total on last page only)				\$	5,000.00	\$	6,000.00	\$	7,000.00	\$	52,000.00	\$	82,000.00	\$	482,000.00	\$	1,032,000.	\$	1,081,000.	\$Total	1,081,000.

## Cost Summary

**U.S. Department of Housing  
and Urban Development**  
Office of Public and Indian Housing

OMB Approval No. 2577-0218  
(exp. 08/31/2019)

## Indian Housing Block Grant

**NOTE:** This form is intended for use only by awardees of competitive IHBG funds.

See Instructions and Public Reporting Statement on back.

<b>1. Name of Applicant</b> (as shown in Item 5, Standard Form 424)			<b>2. Application/Grant Number</b> (to be assigned by HUD upon submission)			
<b>3.</b> <input type="checkbox"/> <b>Original</b> (check here if this is the first submission to HUD)			<input type="checkbox"/> <b>Revision</b> (check here if submitted with implementation schedule as part of pre-award requirements)		<input type="checkbox"/> <b>Amendment</b> (check here if submitted after HUD approval of grant)	
			Date (mm/dd/yyyy)			
<b>4.</b>	Project Name & Project Category  a	Planned NAHBG Expenditures  b	Planned Other Federal Funds Expenditures  c	Planned Non-Federal Funds Expenditures  d	Total Planned Expenditures  e	Source of Other Funds for each Activity  f
<b>5. Administration</b>						
a. General Management and Oversight.						
b. Indirect Costs: Enter indirect costs to be charged to the program pursuant to a cost allocation plan.						
c. Audit: Enter estimated cost of Program share of financial audits.						
<b>Administration Total</b>						
<b>6. Sub Total</b> Enter totals of columns b, c, and d.						
<b>7. Grand Total</b> Enter sum of columns b, c, and d.						

---

Public reporting burden for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

This collection of information requires that each eligible applicant submit information to enable HUD to select the best projects for funding during annual competitions for the IHBG Competitive Program. The information will be used by HUD to determine whether applications meet minimum screening eligibility requirements and application submission requirements. Applicants provide general information about the project which is preliminary to the review of the applicant's response to the criteria for rating the application. The information is essential for HUD in monitoring grants to ensure that grantees are making proper use of Federal dollars. Responses to the collection are required by Section 105 of the Department of Housing and Urban Development Reform Act (P.L. 101-235) as amended by the Cranston-Gonzales National Affordable Housing Act of 1990. The information requested does not lend itself to confidentiality.

---

## **RATING FACTOR 1 – CAPACITY OF THE APPLICANT**

**1.1 Managerial and Technical Staff:** *The Kilkich Accessible Housing Construction and Rehabilitation Project* will be managed by the Coquille Indian Housing Authority (CIHA), the Tribally-designated housing entity of the Coquille Indian Tribe. In 1954 the federal recognition of the Coquille Indian Tribe was terminated as part of the now repudiated Western Oregon Indian Termination Act (Public Law 588). For the next quarter of a century, the Tribe worked to have their rights returned and their recognition as a sovereign Tribal government restored by the Federal government. In 1989, these efforts were rewarded when President George H.W. Bush signed the Coquille Restoration Act into law. One of the earliest acts of the newly restored Tribal government was in 1992 when they created CIHA pursuant to the authority of the Tribe's Constitution and statutes.

For the last 27 years, CIHA has been responsible for establishing and maintaining safe, healthy, and affordable housing for Coquille Tribal members and other Native Americans living in the Kilkich community, which serves as the main residential reservation for the Tribe. The 1,100-acre parcel had been used as timber lands when the Tribe acquired it in 1993. In 26 short years, led by the talent and tenacity of CIHA, Kilkich is now home to 241 residents living in the 95 housing units located on the premises. This includes 63 housing units occupied by low-income American Indian or Alaska Native (AI/AN) families, 48 of which include Coquille Tribal members. Three of the housing units are currently used for non-residential purposes that support the safety and wellbeing of the Kilkich community including the Coquille Indian Tribe Police Department administrative offices, the South Coast Interagency Narcotics Team administrative office, and Elders gathering house. CIHA operates its low-income housing program under support by the Tribe and with assistance of grant funding under NAHASDA. The track-record of

accomplishments, coupled with the ongoing management activities demonstrate CIHA's managerial, technical, and administrative capability necessary to undertake the key elements of the *Killich Accessible Housing Construction and Rehabilitation Project*.

Project Management Staff: CIHA has a staff of nine employees, all of whom have worked for CIHA for many years and whose experience in affordable housing and community development totals in excess of 125 years cumulatively. The *Killich Accessible Housing Construction and Rehabilitation Project* management team builds on the relevant and recent expertise of CIHA staff and is supported by contractors where needed. Key members of the project management team include:

Anne Cook (Executive Director/Project Manager): As Project Manager, Anne will oversee all day-to-day aspects of the project and serve as primary liaison with the CIHA Board of Commissioners and the Coquille Indian Tribe's Tribal Council. Anne has worked for CIHA for 17 years, the last 15 where she has served in the role of Executive Director. In the last five years, Anne has managed funds of more than \$9 million, including over \$5 million in grants funding, oversaw more than \$2.5 million in construction and rehabilitation projects including, the renovation and remodeling of 45 housing units, installation of three garden and park areas, and the construction of community support facilities such as the 20,480 sq. ft. CIHA Projects and Maintenance Operations and Storage Facility. Each of these projects was completed on-time, on-budget, and all associated administrative documents and grant reports were filed within the requirements of the funding program.

Lyman Meade (Deputy Director/Project and Logistics Coordinator): As Project Coordinator, Lyman will work with the Architect to finalize the new construction design, develop bid documents, and select a General Contractor. In addition, Lyman will work as the

*owner's representative* on the project where he will oversee construction and rehabilitation activities, inspect and verify quality of work, and address any unforeseen obstacles that may arise. In addition, Lyman will coordinate with the residents in neighboring properties to ensure the project proceeds with the least disruption to the community as possible. Lyman has more than 25 years of direct experience in planning, managing, and implementing rehabilitation, new construction, and other related projects and has owned and operated his own construction company. Lyman has worked for CIHA for 17 years, the last six of which he has served in the role of Deputy Director. Over the last five years, Lyman has provided project coordination and construction management on more than \$2.5 million of projects, including two Section 504 home conversions, rehabilitation of housing units and facilities, community improvements, and construction of new facilities.

*Marcy Chytka (Accounting Services Coordinator/Financial Management):* CIHA Accounting Services Coordinator Marcy Chytka oversees all aspects of CIHA's financial activities, maintains its records of account, and assures compliance with its financial management policies, HUD accounting requirements, generally accepted accounting principles, and other applicable laws and regulations. On this project, Marcy will coordinate multiple funding streams, ensure successful performance of all accounting functions, maintain complete and accurate records, compile and submit timely financial reports, and record and track all capital improvements to ensure proper compliance with ongoing useful life requirements. Marcy has 18 years accounting experience, including 15 years of service to CIHA. Over the past five years, Marcy has handled the receipt and expenditure of more than \$9 million for CIHA including multiple construction and rehabilitation activities in addition to its regular operations. Most notably, Marcy was directly responsible for financial management of the CIHA Projects

and Maintenance Operations and Storage Facility construction project, which totaled in excess of \$2.25 million and involved a complex financing structure combining grant, bond, loan, and private funds requiring compliance with stringent accounting and performance standards.

Debbie Dennis (Administrative Services Coordinator/Compliance Management): As a member of the project management team, CIHA Administrative Services Coordinator Debbie Dennis will support procurement, scheduling, construction, accounting, reporting, and other project activities to ensure timely implementation of the project in compliance with funding requirements, policies, regulations, and other applicable standards. In the past five years, Debbie has served as compliance liaison and maintained project files for all CIHA construction and rehabilitation work including the Projects and Maintenance Operations and Storage Facility Project where Debbie handled numerous compliance activities including ensuring sam.gov, licensing, insurance, and other qualification requirements were met; reviewing contractors and subcontractors for suspension and debarment; obtaining background checks for proposed contractor personnel; and performing HUD Labor Standards employee interviews, tracking and reviewing certified payrolls, obtaining additional payrates for unrated classifications, and assuring posting requirements were met. In addition, Debbie recorded procurement activities, documented and photographed project progress, and provided logistical support. Debbie will perform these duties for the *Killich Accessible Housing Construction and Rehabilitation Project* as well.

Contractors and Supporting Functions: In addition to the management staff, the *Killich Accessible Housing Construction and Rehabilitation Project* will be supported through the efforts of additional service providers and contractors including:

Rich Turi (Principal Richard P. Turi Architecture): Rich has provided conceptual design and budget estimating for this project. In addition, Rich will provide final design and preparation of bid documents for the *Kilkich Accessible Housing Construction and Rehabilitation Project*. As a licensed architect, Rich has designed 72 of the 95 housing units in the Kilkich community. In addition, Rich has provided architectural design for other Tribal projects including its Community Plankhouse and CIHA's Projects and Maintenance Operations and Storage Facility. Over the last five years, Rich has designed more than 74 structures in and around Coos County resulting in more than \$11 million of construction activity. Due to his knowledge of CIHA's housing program and his experience in local construction, Rich brings a wealth of experience to this project that can benefit CIHA in everything from design innovations in accessibility to evaluating contractors and sub-contractors.

Plan for Managing any Capacity Gaps: This project will require contracting with one or more qualified General Contractors. CIHA has developed a proven process designed to communicate the scope of work (bid documents), solicit proposals from qualified contractors (RFP process), review and evaluate proposals (screening process), as well as select and contract with a service provider (procurement process). These protocols and processes will be utilized for selecting the General Contractor(s), which at this point reflects the only anticipated gap in CIHA's capacity to undertake this project.

**1.2 Procurement and Contract Management:** In 1992, CIHA developed and adopted a Procurement Policy in consultation with HUD which is regularly reviewed and revised as needed. The last revision of the policy occurred in 2017 to ensure compliance with the updated procurement standards of 2 CFR Part 200 and 24 CFR Part 1000. The CIHA Procurement Policy applies to all contracts for supplies, services, and construction entered into by CIHA as well as

all CIHA expenditures for public purchasing regardless of the resource. The adopted procurement policy states, “*All procurement transactions shall be administered and executed by the Contracting Officer, who shall be the Executive Director or other individual he or she has authorized in writing.*” The last independent audit completed for CIHA was last year (FY 2018) and the auditors findings stated, “in our opinion the Coquille Indian Housing Authority complied, in all material respects, with the types of compliance requirements referred above (*includes reference to 2 CFR Part 200*) that could have direct or material effect of its major federal program for the year ended September 30, 2018” (italicized comment added for clarification). Specific adopted policies that demonstrate this compliance include:

- *Procurement Authority:* “Solicitation procedures are conducted in full compliance with federal standards stated in 2 CFR §200.317-326, the Indian preference requirements and methods of procurement in accordance with the applicable NAHASDA regulations...”
- *Cooperative Purchasing:* “CIHA may enter into interagency agreements to conduct direct procurement based on economy and efficiency...CIHA may utilize governmental excess and surplus property programs instead of purchasing new equipment and property if suitable for the purpose of the procurement.”
- *Procurement Procedures:* The policies describe procedures that conform to the required elements of 2 CFR Part 200.320(d) for competitive bidding. The process requires 1) preparation and publish a solicitation for written proposals, 2) submission with an adequate number of proposals from qualified sources, 3) review of submitted proposals based on previously developed written evaluation criteria, 4) interview or other final screening of top qualifying proposers, and 5) negotiation of contract with selected proposer.

- *Contractor Oversight:* “Contracts will contain guidelines for inspection of supplies, services or construction, as well as monitoring contractor performance, status reporting on construction contracts and similar matters.”
- *Conflicts of Interest:* “CIHA prohibits its officers, employees, and agents from participating directly or indirectly in the selection or in the award or administration of any contract if a conflict, real or apparent, would be involved.” (the policy goes on to define officers, employees, or agents, their relatives, their partner, and/or an organization that employs, or is negotiating to employ, any of the above.)

The Conflict of Interest policy above, also meets the requirements of 24 CFR Part 1000.30.

Policies that address 24 CFR Parts 1000.48-54 include:

- *Tribal and Indian Preference:* “CIHA shall, to the greatest extent feasible, provide preference first to Tribal member-owned economic enterprises and organizations, and then to Indian-owned economic enterprises and Indian organizations in the procurement of small purchases”
- *Protests Involving Indian Preference:* “Complaints arising out of any of the methods of providing for Indian preference shall be handled in accordance with the procedures prescribed by the NAHASDA regulations at 24 C.F.R. 1000.48-52.”

**1.3 IHBG Expenditures:** CIHA is not approved for investing formula IHBG funds. Therefore, Option #1 under this criteria will be used for evaluating administrative capacity. Between the last three years (2016-2018) CIHA has received \$3,298,302 in IHBG formula funds. On May 7, 2019, when the NOFA for this program was published, CIHA had \$0 in HUD’s Line of Credit Control System. This reflects no undisbursed balance of cumulative funding for the last three fiscal years.

#### **1.4 Findings:**

For the rating period of October 1, 2015 through August 8, 2019, CIHA has not been monitored or received monitoring reports from HUD's Northwest Office of Native American Programs. However, CIHA's annual financial audits for the period and annual self-monitoring program reports, included in their entirety in their Annual Performance Reports, do not identify any open findings or concerns.

**1.5 Timely Reports:** As a recipient of HUD-ONAP grants, CIHA regularly produces and submits required reports, including Indian Housing Plans, Annual Performance Reports, and Federal Financial Reports (SF-425). CIHA diligently submits these reports in a timely fashion within required deadlines. Such is the case for the submission of these reports in the one-year period prior to the publication of the NOFA for this program (May 7, 2019).

*Copies of relevant documentation for Rating Factor 1 has been included and referenced by subject in the Rating Factor Supporting Documents attachments.*

#### **RATING FACTOR 2 – NEED/EXTENT OF PROBLEM**

**2.1 Identified Needs and Other Supporting Data:** *The Kilkich Accessible Housing*

*Construction and Rehabilitation Project* is designed to address the housing shortage facing AI/AN populations in southwest Oregon by constructing new housing units and rehabilitating existing housing units on the Kilkich Reservation.

**2.1a Identified Needs:** The information below reflects the required discussion on need factors, project type, and proposed project activities:

Need Factors: Except where otherwise noted, the following data is derived from the FY 2020 HUD Formula Response Form (FRF) for CIHA. The formula area for CIHA consists of overlapping areas including the "Coquille Reservation, OR- Coos County, OR", the remainder of

Coos County, along with Curry, Jackson, Douglas, and Lane counties. The Bureau of Indian Affairs estimates the Total Resident Service Area Indian Population for CIHA to consist of 5,186 AI/AN individuals. However, the FRF shows a capped AI/AN population for CIHA of 2,174 in the formula area. The need factor findings for CIHA's formula area as reported in the FRF include:

- Households with housing cost burdens greater than 50% of formula annual income. (171)
- AI/AN households which are overcrowded or without kitchen, or plumbing. (52)
- Housing shortage in formula area. (357)
- AI/AN households with annual income less than or equal to 30% of median income. (141)
- AI/AN households with annual income between 30% and 50% of median income. (131)
- AI/AN households with annual income between 50% and 80% of median income. (142)

Project Type: The *Killich Accessible Housing Construction and Rehabilitation Project* combines both the construction of three new housing units along with the rehabilitation of three existing housing units.

Project Activities: All of these housing units will be incorporated into CIHA's existing income-indexed Low Rent program specifically to benefit low income Indian families. The *Killich Accessible Housing Construction and Rehabilitation Project* calls for constructing three new housing units and rehabilitating three existing housing units constructed. The rehabilitation activities will focus on three single family units each constructed in 1996. Specifically, the rehabilitation will address deteriorating conditions in these homes and convert them into Section 504 of the Rehabilitation Act compliant housing that will accommodate disabled tenants and allow elders to age in-place – two populations that disproportionately are low-income and experience the most severe shortage in appropriate housing.

The new construction consists of building a 1,215 sq. ft. 2-bedroom, 2-bath single family home and a duplex with two 990 sq. ft. 2-bedroom, 2-bath units. Construction will take place on two vacant lots in the Kilkich community. The necessary infrastructure (water, sewer, utilities) are all available at the street and will not require additional build-out. Each of the new housing units will be Section 504 compliant and include design features similar to those described below.

The rehabilitation element of this project focuses on three 20-year old single family units. Each of these units is showing deteriorating conditions that if left unaddressed will substantially limit the usable life of the buildings. The units are each 3-bedroom, 2-bath, which are in high demand for residents with disabilities and elders as they accommodate room for family and/or live-in caregiver(s). Further, the rehabilitation approach will slightly expand each of these units to accommodate larger bathrooms that provide adequate turn area to enhance accessibility. After rehabilitation and construction, two of the units will be 1,292 sq. ft. and the other will be 1,318 sq. ft. In addition, to mitigating deteriorating conditions, these units will each be converted to be Section 504 compliant, including:

- *Barriers:* Removal of physical barriers in the kitchen, living room, and other areas to enhance overall accessibility.
- *Kitchen:* Lowering kitchen cabinets and counter heights, installing self-closing doors, developing roll-up work areas, and installing stoves with controls on the front for easy access.
- *Bathroom:* Install roll-in showers, grab bars, accessible toilets, and accessible cabinets, mirrors and water faucets. In addition, the design will allow for adequate turn space.
- *Closets:* Widen the doors and lower the clothes rods and shelves.
- *Doorways:* Widen doorways and install lever handles.

- *Flooring:* Install hard surface flooring throughout.
- *Entries:* Install low profile thresholds, entrance ramps, lever handles, and replace sliding door with passage door.
- *Electrical:* Raise electrical outlets as well as lower light switches and install rocker switches.
- *Resource Conservation Measures:* Incorporate sustainable design elements including water conservation fixtures, solar tubes in expanded bathrooms, LED lighting, and exhaust fans.

Collectively these activities will address the shortage of affordable housing for AI/AN populations by 1) increasing the overall housing inventory, 2) increasing the overall housing inventory for low income AI/AN persons, 3) addressing accessibility needs for disabled and elder populations, and 4) extending the life expectancy of existing housing units by at least 20 years.

**2.1b Other Supporting Data:** In 2018 the United Way of Southwestern Oregon commissioned a study to identify the housing obstacles and opportunities facing the incorporated and unincorporated areas of Coos County. The resulting “Coos County Oregon Housing Analysis and Action Plan” provides a comprehensive overview of the conditions facing the AI/AN populations in greater Coos County. Key findings include:

- *Aging Population:* “Coos County’s median age increased from 43.1 to 48.2 years old between 2000 and 2016. The percentage of residents aged 62 and older grew from 22.5% to 29.5%.” (pg. 6). “The county’s median age has increased by 12% since 2000 making Coos County the 10<sup>th</sup> oldest county in the state and these older households are aging in place to a greater extent than the state in general.” (pg. 28)

- *Expanding Housing Costs:* “Housing costs have increased significantly despite a static population and declining workforce. This is partially attributable to speculation in the vacation home market.” (pg. 8)
- *Shrinking New Home Construction:* “Based on the lack of population growth, stagnant incomes, and an aging population with little need for new homes, it is no surprise that housing production has nearly ground to a halt.” Between 1950-2010 the average number of new homes built per year in the county was 401. Since 2010 the annual average has plummeted to just 73 countywide. (pg. 9)
- *Shortage of Affordable Housing:* “CZB (*authors of the study*) calculates that the county is short roughly 1,100 units for those earning less than \$20,000.” (italicized entry added for clarification). (pg. 12)
- *Increase in Cost Burden:* “Indeed, nearly 90% of low-income renters in Coos County are cost-burdened, meaning they spend more than 30% of their income on housing expenses.” (pg. 12)

Each of these findings demonstrates the challenges that AI/AN populations face in finding affordable housing in the greater Coos County area. However, collectively, these findings illustrate the grim conditions facing populations that are historically marginalized in housing, including low-income, aging and disabled, and AI/AN populations.

CIHA’s “Indian Housing Plan” submitted to HUD NWONAP on June of 2019 also provides insight into the housing issues impacting the AI/AN populations served by CIHA. Specifically, the plan identifies overcrowded households, substandard housing units needing rehabilitation, and disabled households needing accessibility as housing needs impacting low-income AI/AN populations in the Kilkich community.

While the Coos County Oregon Housing Analysis and Action Plan” provides a countywide overview of housing issues and CIHA’s “Indian Housing Plan” provides an overview of Kilkich specific housing issues, CIHA *FY 2018-2022 Strategic Plan* provides insight into the strategies and priorities that are being undertaken to address these issues. Key objectives adopted in the strategic plan include:

- *Development of income-indexed rental units to serve the independent living needs of Coquille Tribal elders and persons with disabilities.*
- *Provide accessibility features and reasonable accommodation for persons with disabilities as required or financially feasible.*
- *Operate income-indexed Low Rent Program units on Tribal Lands for qualified low- to moderate-income Tribal members and other Native Americans and Alaska Natives.*

**2.2 Project Beneficiaries:** The beneficiaries of the *Kilkich Accessible Housing Construction and Rehabilitation Project* will be low-income Tribal members and other AI/AN persons who will benefit from having an increase of affordable housing options that include accessibility features that are designed to empower individuals, provide accommodations for individuals with disabilities, and help elders age-in-place. This project will directly serve six AI/AN families. CIHA’s application process includes capturing information on household income as means of identifying eligibility for various programs and services. In addition, the application process includes an area where individuals can identify the specific amenities and accessibility accommodations they are seeking and/or require. Finally, CIHA routinely has waiting lists of eligible low-income families, including Tribal elders and individuals with disabilities looking for housing. The current waiting list totals 21 families. These systems and processes that are already

in-place will provide the resources necessary for CIHA to ensure that they will be able to identify the beneficiary families to be served by this project in a timely manner.

**2.3 Past Efforts to Address Identified Need:** CIHA has constructed 81 housing units on the Kilkich Reservation since they were formed in 1992. The last new home construction undertaken by CIHA was in 2003 when they constructed one new single-family housing unit on the Kilkich Reservation. The unit was constructed for CIHA's lease-purchase homebuyer program and contained some, but not full, accessibility features. Since that time, CIHA has been actively engaged in a comprehensive effort to structurally rehabilitate and modernize the 72 original units developed with 1937 Housing Act funds. As such, resources have not been available to allocate towards construction of new units.

Of the four housing units retrofitted to Section 504 compliance, one transitioned to the lease-purchase homebuyer program, one is used for activities of community elders, and two remain in the Low Rent program. Retrofit of the two Low Rent rentals was completed in FY 2012 and FY 2016. The primary obstacle to increasing the rate of Section 504 conversion in rehabilitation projects has been the lack of available resources.

**2.4 Current Funding Assessment:** CIHA's allocation of IHBG funding hasn't changed since 1999. However costs have continued to climb resulting in a reduction of buying power by approximately 35% over the last two decades. CIHA has received some financial support from the Coquille Indian Tribe. However, as a Tribe terminated in 1954 and restored in 1989, the Coquille Indian Tribe has been rebuilding its entire governmental capacity from essentially the ground up. The ability of the Coquille Indian Tribe to provide substantial funding support for CIHA programs has been further exacerbated by the remnants of the Great Recession of 2008. While much of the country has recovered economically, the southwestern Oregon coast still lags

significantly behind the state and the nation in household income levels and civilian employment rates. As a result, the Coquille Indian Tribe has been required to make substantial investments in health care, social services, and employment programs to meet the needs of the Tribal members. Unfortunately, these investments have directly reduced the available funds to support new housing development and/or rehabilitation projects.

**2.5 Sustainability:** As discussed previously, the *Killich Accessible Housing Construction and Rehabilitation Project* is reflective of the goals and priorities as enunciated in CIHA's Strategic Plan and will result in mitigating the overcrowded conditions and the deteriorating conditions of some older housing units. In addition, this project also directly addresses the long-term vision and goals of the Coquille Indian Tribe's "Empire Comprehensive Plan" which was adopted in 2018 and is used to guide the Coquille Indian Tribe's development decision-making related to the entire Killich Reservation and addresses future housing growth, infrastructure development, transportation systems, as well as future economic development activities on the Killich Reservation. The findings of the Comprehensive Plan include anticipated population growth in the Killich community through at least 2030 and with it an increase in demand for affordable housing. Further, the plan goes on to note, that there is substantial "*Potentially high rate of housing obsolescence (outdated housing stock) is driving a pent-up demand for new housing, despite modest development activity*" (page 27). The plan also identifies development standards including but not limited to housing zones and density standards. This project supports the overall vision of this plan and conforms to the adopted standards outlined in the plan.

CIHA is prepared to commit to sustain the housing units developed in this project and operate them in accordance with Section 205(a) of NAHASDA, to ensure that each housing unit will remain affordable, according to the binding commitments satisfactory to HUD, for the

remaining useful life of each property. To accomplish this, CIHA will utilize Indian Housing Block Grant (IHBG) funds to operate and maintain the units. As evidenced by past Annual Performance Reports, this approach has proved to be effective and efficient. In addition, CIHA has adopted a Low Rent Maintenance Policy that defines processes and procedures. This provides the framework for which the maintenance standards of the properties will be sustained. Finally, as noted in above, the *Killich Accessible Housing Construction and Rehabilitation Project* supports the goals and priorities of the Coquille Indian Tribe's *Empire Comprehensive Plan* and CIHA's *Strategic Plan* by adding three additional affordable housing units that are also Section 504 compliant and remodeling an additional three units to make them Section 504 compliant.

*Copies of relevant documentation for Rating Factor 2 has been included and referenced by subject in the Rating Factor Supporting Documents attachments.*

### **RATING FACTOR 3 – SOUNDNESS OF APPROACH**

**3.1 IHBG Competitive Grant Priorities:** The *Killich Accessible Housing Construction and Rehabilitation Project* directly addresses new construction of affordable housing and rehabilitation of affordable housing – two of the IHBG Competitive Grant program priorities. Individually and collectively, these activities address critical housing shortages and further the availability of affordable housing in CIHA's service area.

**3.1a New Housing Construction Projects:** CIHA is requesting a grant of \$1,274,985 from the IHBG Competitive Grant program. \$815,990 or 64% of the grant funds will be used to carry out the construction of three new affordable housing units for IHBG eligible families. The remainder of the grant funds will be spent on other eligible activities (Housing Rehabilitation Projects).

**3.1b Affordable Housing-Related Infrastructure Projects:** This project does not utilize any IHBG Competitive Grant funds for housing-related infrastructure projects.

**3.1c Housing Rehabilitation Projects:** CIHA is requesting a grant of \$1,274,985 from the IHBG Competitive Grant program. \$458,995 or 36% of the grant funds will be used to carry out the rehabilitation of three existing affordable housing units for IHBG eligible families. The remainder of the grant funds will be spent on other eligible activities (New Housing Construction projects).

**3.1d. Other NAHASDA- Eligible Activities:** This project does utilize any IHBG Competitive Grant funds for other NAHASDA-eligible projects.

**3.2 Project Implementation Plan:** The following are the key elements of the project implementation plan:

Feasibility and Cost Effectiveness: The project calls for construction of three new housing units and rehabilitation for three existing housing units. The site of the new construction is on vacant lots within the existing housing developments of the Kilkich community. The sites have been approved for housing and meet CIHA and Coquille Indian Tribe development standards. Further, the required infrastructure is available to the curb and will not require additional build-out. The new construction costs are estimated to be \$150/ sq. ft. and the rehabilitation costs are estimated at \$76/sq. ft. As such, both of these elements of the project are feasible and cost-effective.

Rationale Behind Project Design: The design of the new construction housing units is based on previous construction undertaken by CIHA and updated to meet Section 504 standards. The architect working on this project has provided design and documents for 72 of the 95 housing units constructed in the Kilkich community. As such, the new units will be consistent with the

rest of the community and CIHA will enjoy cost savings and the benefit of lessons learned from building on an established design.

The design for the rehabilitation of the three units is based on a similar rehabilitation completed in FY 2012. The design elements center around accessibility, independent living, and the ability to age in place.

Location of the Project: The project will be located in the Kilkich community of the Coquille Indian Tribe's Reservation. The land utilized for the project is land held in trust for the Coquille Indian Tribe and CIHA has been authorized to utilize this land for the housing purposes described in this project. To assist in understanding the location of the project, a map has been included in the attachment section of this grant.

Train or Employ Residents Consistent with Section 3 of the Housing and Urban Development Act: Under the IHBG program, CIHA is not required to comply with Section 3 due to the adoption of an Indian Preference ordinance. However, CIHA is open to amending their procurement policy to include a Section 3 provision modeled on the Tribal preference provision.

Compliance with Indian Preference Requirements: The adopted CIHA Procurement Policy includes a provision that states, "*Projects developed and operated with assistance under NAHASDA are subject to Section 7(b) of the Indian Self-determination and Education Assistance Act (25 U. S. C. 450e(b)).*" In addition, the Coquille Indian Tribe has adopted Tribal contract preference requirements in its Fiscal Management Ordinance, Coquille Tribal Code, §160.200(6)(c). In compliance with 25 U.S.C. 4111(k) Tribal preference is applied first and , and only if there is not Tribal contractor that meets those requirements, will the Indian Preference requirements be applied. Further, the procurement policy states, "Eligibility for Tribal preference

shall be established in accordance with Coquille Tribal Code Section 160.200(6)(c). Eligibility for Indian preference shall be established in accordance with procedures consistent with NAHASDA. If CIHA or its prime contractor determines an applicant ineligible for Tribal or for Indian preference, CIHA or the prime contractor shall notify the applicant in writing before contract award, or filling the position, or providing the desired training.”

Affordability Period: CIHA will establish a minimum affordability period for the newly constructed houses as well as the three rehabilitated units of 20 years, this will ensure the units will remain available to IHBG-eligible families for the remaining useful life in accordance with Section 205 of NAHASDA.

Estimated Cost Savings: The energy efficiency measures included in the three new and the three rehabilitated housing units will result in an estimated cost savings of 20% per year.

Size, Number, Address, and Types of Units: The following reflects a summary of the housing units incorporated into this project:

- *New Construction:* Duplex at 498/500 Miluk Drive. Each unit will be 990 sq. ft. in living space with 2 bedrooms and 2 bathrooms.
- *New Construction:* Single Family Dwelling at 2665 Miluk Drive. The unit will be 1,215 sq. ft. of living space with 2 bedrooms and 2 bathrooms.
- *Rehabilitation:* Single Family Dwelling at 708 Jis-ta-jia Circle. This unit will be 1,292 sq. ft. after remodel with 3 bedrooms and 2 baths.
- *Rehabilitation:* Single Family Dwelling at 2608 Mexeye Loop. This unit will be 1,318 sq. ft. after remodel with 3 bedrooms and 2 baths.
- *Rehabilitation:* Single Family Dwelling at 2659 Mexeye Loop. This unit will be 1,292 sq. ft. after remodel with 3 bedrooms and 2 baths.

**3.3 Project Implementation Schedule and Project Readiness:** As required, CIHA has included an Implementation Schedule in the attachment section of this application. The planned start date for this project is January 1, 2020 and all work including the grant reporting is scheduled to be completed by December 31, 2021. In anticipation of this project, CIHA has already completed the following activities: 1) formation of a development team, 2) development of project plan and logistics considerations, 3) site evaluation and mapping, 4) preparation of preliminary design and budget, 5) securing leveraged resources, and 6) initiation of community engagement. Additional work may take place to further readiness to proceed between now and the awarding of this grant, however CIHA affirms that no choice limiting actions will occur prior to the completion of the environmental review process and the approval for the Request for the Release of funds, where applicable.

The rehabilitation/remodel activities of the project are scheduled to all take place during calendar year 2020 and construction of the three new units will take place during calendar year 2021. Key phases of the project and their associated timelines include: a) environmental review for all project elements (Jan.-Feb. 2020), b) finalize design for rehabilitation units (Jan.-Mar. 2020), c) procurement and contracting for rehabilitation units (Mar.-May 2020), d) site prep and construction for rehabilitation units (Jun.-Nov. 2020), e) inspections and tenant move-in to rehabilitated units (Nov.-Dec. 2020), f) finalize design for new construction units (Oct.-Dec. 2020), g) procurement and contracting for new construction units (Jan.-Mar. 2021), h) site prep and construction for new construction units (Apr.-Sep. 2021), and i) inspections and tenant move-in to newly constructed units (Sep.-Oct. 2021). Detailed tasks and milestones associated with each of these areas have been provided in an expanded work plan included in the attachment section as well as on HUD Form 53247.

**3.4 Budget:** The total project budget is \$1,699,985 of which CIHA is requesting grant funds of \$1,274,985 and will be providing \$425,000 in leveraged funds as discussed and documented in Rating Factor 4. The budget includes \$618,975 for the rehabilitation of the three existing units and \$1,081,010 for the construction of the three new units. None of the budgeted expenses include pre-award costs. Further, the land on which the project will take place has not been incorporated into the budget as it is Tribal land and has not been included as part of the leveraged funds. The key budget categories includes \$32,000 for architectural and engineering costs, \$15,000 for site development, \$1,195,200 for construction costs, \$7,200 for legal and consulting services, \$7,000 for site security, and \$187,145 in contingency costs. Further, the budget allocates \$248,440 for planning, administrative, environmental, and oversight, which reflects 20% of the budgeted project hard costs and does not include any request for indirect costs. A detailed breakdown of costs, including breakdowns for the rehabilitation part as well as the new construction part of the project has been included in the HUD Form 53246 and the Budget Narrative, which are both included in the attachment section of this application.

Utilizing the approved methodology as detailed in PIH 2019-19 Notice from the HUD Office of Public and Indian Housing, the per-unit total development cost for the new construction components of the project is \$360,337 which is \$1,333 less than the affordable housing moderate design standards for a 2 bedroom unit under the Native American Housing Assistance and Self-Determination Act of 1996.

The budget was developed by the CIHA Project Management Team with assistance from Rich Turi, the architect who has designed 72 of the 95 housing units in the Kilkich community. Within the last five years, Mr. Turi also provided the preliminary cost estimate and budget for CIHA's Projects and Maintenance Operations and Storage Facility. Further, in the last five years

more than \$11 million of construction in the greater Coos County area has directly resulted from Mr. Turi's designs. This provides Mr. Turi with extensive knowledge on conditions in the local construction industry and how they may impact the overall budgeting process.

*Copies of relevant documentation for Rating Factor 3 has been included and referenced by subject in the Rating Factor Supporting Documents attachments.*

#### **RATING FACTOR 4 – LEVERAGING RESOURCES**

As evidenced by the Resolution from the CIHA Board of Commissioners , CIHA will provide \$25,000 in IHBG funds and \$400,000 in non-program funds to support this project. This reflects total leveraged funds of \$425,000 or 25% of the total IHBG Competitive Grant project costs.

#### **RATING FACTOR 5 – COMPREHENSIVENESS AND COORDINATION**

**5.1 Coordination:** CIHA has engaged and involved community members, Tribal members living outside of the community, as well as leadership and staff from the Coquille Indian Tribe in identifying housing goals, formulating responsive strategies, and implementing effective solutions. The involvement and inclusion of the community and collaborative partners is evident in the processes that have led to the formation of the *Kilkich Accessible Housing Construction and Rehabilitation Project* plan and implementation strategy. For instance, CIHA produces a monthly newspaper *Sea-Ha Runner* that provides information on activities in the community, invites community participation in meetings and planning sessions, and helps connect the community with CIHA staff and Board. CIHA also participates in monthly meetings of the Kilkich residents Association (KRA) where needs are identified, strategies are formulated, and collaborative efforts are launched. Further, the residents and other stakeholders are invited to

provide insight and information at the monthly meetings of CIHA Board of Commissioners and/or Tribal Council work sessions.

The instruments mentioned above reflect regular monthly activities that provide ongoing and institutional ways that the voice of the community and the collaboration with other Tribal departments and stakeholders are incorporated. However, CIHA also strives to involve community members and collaborative partners in a series of annual project review and planning processes. For instance, each year CIHA prepares an Annual Performance Report (APR) to assess outcomes and obstacles, an Indian Housing Plan (IHP) to set goals and outcomes, and a Master Projects List to set priorities. The community and stakeholders are invited to participate in Board meetings, provide their insights and observations at Tribal events and the local library, and/or review and comment on the Tribal members-only website, My Tribe, or the Authority's public webpage.

Finally, community members and stakeholders also enjoy robust engagement in comprehensive planning processes undertaken by CIHA and/or the Coquille Indian Tribe on a frequent – but not annual basis. For instance, in 2017 CIHA undertook a strategic planning process that resulted in the formulation and adoption of CIHA's *FY 2018-2022 Strategic Plan*. Similarly, the Coquille Indian Tribe updated their Strategic Plan in 2018. The planning process utilized by the Tribe included community listening sessions and a survey, which was completed by 33 percent of Tribal members 14 years of age or older. In July of 2018, the Tribe completed a comprehensive planning process for the Reservation, which includes the Kilkich Community. This process was led by a multi-disciplinary team which included representatives of CIHA, Tribal Council, Tribe's Executive Team, THPO office, Tribal Natural Resources, CEDCO (the Tribe's business arm), MEDC (the Tribe's economic development organization), along with

representatives of Coos County, City of Coos Bay, City of North Bend, and the Charleston Sanitary District. In addition, the planning process included outreach to the Tribal members and the residents of the Kilkich community to identify needs and formulate strategies around housing, transportation, open spaces, and economic development for the Reservation lands.

The elements of the *Kilkich Accessible Housing Construction and Rehabilitation Project* are derived from the community engagement planning processes and reflect the priorities and strategies enunciated in the reports and plans described above. For instance, the need for Section 504 housing was identified in CIHA housing plans and project lists dating back to 2008. Strategies for assessing existing properties and developing Section 504 remodel/rehabilitation plans have been underway for the last 11 years. The goal of constructing three new Section 504 housing units is included in the FY 2020 IHP. Finally, the development of additional housing and rehabilitation of existing housing to address overcrowding, improve accessibility and accommodations for individuals with disabilities, and assist elders with the ability to age-in-place are all supportive of goals, priorities, and objectives enunciated in CIHA FY 2018-2022 Strategic Plan, the Coquille Indian Tribe's Updated Strategic Plan (2018), and the Empire Comprehensive Plan.

**5.2 Outputs and Outcomes:** The outputs and outcomes associated with this project are reflected in the CIHA's Indian Housing Plan for FY 2020 and include:

- Number of housing new units constructed (3)
- Number of housing units rehabilitated (3)
- Number of Section 504 compliant housing units added (6)
- Number of new affordable housing units added to inventory (3).
- Number of AI/AN families added to Kilkich community (6).

Similarly, the outcomes identified in the CIHA's Indian Housing Plan for FY 2020 include:

- *For Construction of 3 New Units* – The identified outcome in the Indian Housing Plan is “create new affordable rental units”
- *For Rehabilitation of 3 Existing Units* – The identified outcome in the Indian Housing Plan is “Provide accessibility for elderly/disabled persons.”
- *Additional Outcomes* – In addition to the identified outcomes from the Indian Housing Plan, this project directly addresses the following outcomes:
  - Reduction in overcrowding.
  - Reduction in number of families living in substandard housing.
  - Increase in number of units that are accessible and accommodate persons with disabilities.
  - Improved energy efficiency.

*Copies of relevant documentation for Rating Factor 5 has been included and referenced by subject in the Rating Factor Supporting Documents attachments.*

## **OTHER FACTORS**

**Opportunity Zone:** The Kilkich community is located in its entirety in census tract 41011000504, which is listed as a Qualified Opportunity Zone on the U.S. Department of Treasury's website: <https://www.cdfifund.gov/Pages/Opportunity-Zones.aspx>. (a map and listing has been included in the attachment section of this grant application.) As all proposed work will take place within the Kilkich Community, CIHA certifies that this project meets the requirements of the IHBG Competitive Grant program to receive preference points associated with investment in Qualified Opportunity Zones.

**Rating Factor 1  
Supporting Attachments**

**Rating Factor 1.1**

Organizational Chart	2
Relevant Excerpts from Procurement Policy: Contracting	3-14

**Rating Factor 1.2**

Relevant Excerpts from Procurement Policy: Procurement & Contracts	15-22
--	-------

**Rating Factor 1.4**

Excerpt from FY 2018 Annual Performance Report	23-29
--	-------

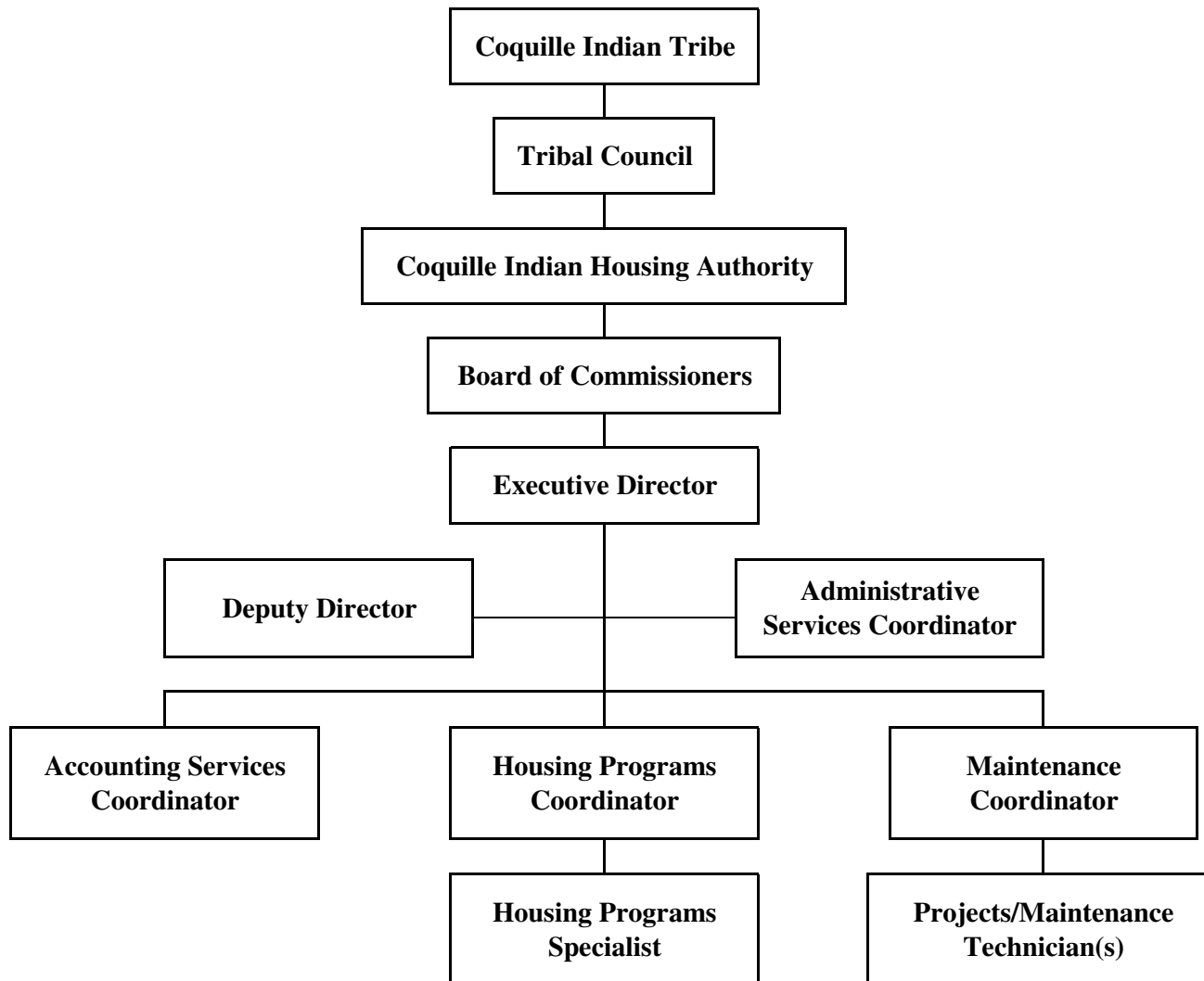
**Rating Factor 1.5**

Documentation from Most Recent Audit Submission	30-31
---	-------



# COQUILLE INDIAN HOUSING AUTHORITY

## ORGANIZATIONAL CHART



**COQUILLE INDIAN HOUSING AUTHORITY**  
**PROCUREMENT POLICY**

---

**E. Specifications**

- 1. General.** All specifications shall be drafted so as to promote overall economy for the purposes intended and to encourage competition in satisfying CIHA's needs. Specifications shall be reviewed before solicitation to ensure that they are not unduly restrictive or represent unnecessary or duplicate items. Functional or performance specifications are preferred. Detailed product specifications shall be avoided when possible. Consideration shall be given to consolidating or breaking out procurement to obtain a more economical purchase. For equipment purchases, a lease versus purchase analysis should be performed to determine the most economical form of procurement.
- 2. Limitations.** The following specification limitations shall be avoided: geographic restrictions not mandated or encouraged by applicable federal law (except for architect-engineer contracts, which may include geographic location as a selection factor if adequate competition is available); unnecessary bonding or experience requirements; brand name or equal specification (unless they list the minimum essential characteristics and standards to which the item must conform to satisfy its intended use). Nothing in this Procurement Policy shall preempt applicable licensing laws. Specifications shall be scrutinized to ensure that organizational conflicts do not occur (e.g., having a consultant perform a study of CIHA's computer needs and then allowing the consultant to compete for the subsequent contract for the computers).

**II. PROCUREMENT METHODS**

**A. Selection of Method**

CIHA shall choose one of the following procurement methods based on the nature and anticipated dollar value of the total requirement.

**B. Small Purchase Procedures**

- 1. General.** Any procurement not exceeding \$150,000 may be conducted in accordance with the small purchase procedures authorized in this section. Contract requirements shall not be artificially divided so as to constitute a small purchase under this Section (except as may be reasonably necessary to comply with Section V of this policy).
- 2. Tribal and Indian Preference.** CIHA shall, to the greatest extent feasible, provide preference first to Tribal member-owned economic enterprises and organizations, and then to Indian-owned economic enterprises and Indian organizations in the procurement of small purchases.
- 3. Petty Cash Purchases of \$100 or Less.** Small purchases under \$100 which can be satisfied by local sources may be processed through the use of a petty cash account.

## COQUILLE INDIAN HOUSING AUTHORITY

### PROCUREMENT POLICY

---

Such purchases shall be distributed equitably among qualified sources. No quotation is required if CIHA considers the price to be reasonable.

- 4. De Minimis or Micro Purchases of between \$100 and \$5,000.** For small purchases of less than \$5,000, also known as de minimis or micro purchases, only one price quote is required, provided the quote is considered reasonable. Quotes may be obtained orally (either in person or by telephone), by fax, catalog, website, email, letter, or other informal procedure. If the purchase is made for reasons other than price, the file must clearly describe the reason for the purchase. Under no circumstances will a purchase be broken down into more than one action in order to meet the micro purchase threshold (except as may be reasonably necessary to comply with Section V of this policy). The de minimis or micro purchase must be documented by an authorized purchase order or contract.
- 5. Small Purchases of between \$5,000 and \$150,000.**
  - a. Obtaining quotes.** CIHA shall solicit price quotations by phone, fax, catalog, website, email, letter, or other informal procedure that allows participation by a reasonable number of competitive sources. When soliciting quotations, CIHA shall inform the sources solicited of the specific item being procured, the time by which quotations must be submitted, and the information required to be submitted with each quotation. CIHA shall obtain written quotations; however, the written quotation may be confirmation of a previous oral quotation only if it is submitted within 10 days of the oral quotation or by the due date for submitting quotations. The names, addresses, and/or telephone numbers of the offerors and persons contacted, and the date and amount of each quotation shall be recorded and maintained as a public record.
  - b. Competition.** CIHA shall attempt to obtain quotations from a minimum of three qualified sources and document the procurement file with a justification whenever it has been unable to obtain at least three quotations. Solicitation of fewer than three sources is acceptable if CIHA has attempted but has been unable to obtain a sufficient number of quotations. The sole quotation received may be accepted only in unusual circumstances, such as an emergency threatening public health and safety, financial emergency, or catastrophic circumstances; for a proprietary product or service or a product or service available from only one source; when CIHA determines that the delays caused by re-soliciting would cause higher costs or unreasonable delay; or, where CIHA determines and documents that the proposal has a fair and reasonable price.
  - c. Tribal and Indian preference in award.**
    - i. Award based on price.** For small purchases awarded based on price or fixed specifications (i.e. not subject to negotiations), CIHA shall make award to the qualified Tribal member-owned economic enterprise or organization

## COQUILLE INDIAN HOUSING AUTHORITY

### PROCUREMENT POLICY

---

with the lowest responsive quotation if it is reasonable and no more than 10% higher than the lowest responsive quotation received. If there is no such Tribal member-owned enterprise or organization, CIHA shall make award to the qualified Indian-owned economic enterprise or organization with the lowest responsive quotation if it is reasonable and no more than 5% higher than the lowest responsive quotation received. If no responsive quotation is received from a qualified Tribal member-owned economic enterprise or organization that is within 10% of the lowest responsive quotation from any qualified source, and if no responsive quotation is received from a qualified Indian-owned economic enterprise or organization within 5% of the lowest responsive quotation from any qualified source, then award shall be made to the source with the lowest quotation.

- ii. **Award based on factors other than price.** For small purchases to be awarded based on factors other than price, a formal solicitation (request for proposals or request for quotations) shall be issued, including evaluation factors and a rating system to evaluate each proposal or quotation. The solicitation shall reserve 15% of the total evaluation points for providing Tribal and Indian preference. Award shall be made to the best proposal or quotation in accordance with the stated rating system.

- 6. **Blanket Purchase Orders and Agreements.** Blanket Purchase Orders and Agreements may be used for expendable supplies and routine services. For expendable supplies, CIHA shall prepare a list of products with an estimate of the volume or quantity of each product historically purchased in a one-year fiscal period. Quotes shall be obtained using the small purchase procedures set forth above. The maximum total value of a Blanket Purchase Order or Agreement may not exceed \$150,000.

#### **C. Sealed Bidding (Purchases over \$150,000)**

- 1. **Conditions for Use.** Contracts shall be awarded based on competitive sealed bidding if the following conditions are present: a complete, adequate, and realistic specification or purchase description is available; two or more responsible bidders are willing and able to compete effectively for the work; the procurement lends itself to a firm fixed price contract; and, the selection of the successful bidder can be made principally on the basis of price. Sealed bidding is the preferred method for construction procurement. Sealed bidding should not be used for professional services contracts.
- 2. **Solicitation and Receipt of Bids.**
  - a. **Issuance and amendment.** An invitation for bids shall be publicly advertised and bids shall be solicited from an adequate number of known suppliers, providing them sufficient time prior to the date set for opening the bids. An

## COQUILLE INDIAN HOUSING AUTHORITY

### PROCUREMENT POLICY

---

- invitation for bids shall be issued including specification of all contractual terms and conditions applicable to the procurement, and must adequately define the items or services for bid in order for the bidder to properly respond. Any amendments to the invitation shall be in writing. If it is necessary to issue an amendment within 7 calendar days of the bid opening, the bid opening shall be postponed until at least 7 calendar days after the issuance of the amendment. The invitation for bids shall state the time and place for both the receipt of bids and the public bid opening. All bids received shall be time-stamped but not opened and shall be stored in a secure place until bid opening. A bidder may withdraw its bid at any time prior to bid opening.
- b. **Restricting solicitations.** The invitation may be restricted to qualified Tribal member- and Indian-owned economic enterprises and organizations if CIHA has a reasonable expectation of receiving the required minimum number of bids from them. CIHA shall solicit bids from non-Indians as well as Tribal member- and Indian-owned economic enterprises or organizations if: CIHA decides not to restrict the solicitation; an insufficient number of qualified Tribal member- and Indian-owned economic enterprises or organizations submit responsive bids in response to a solicitation; or, a single bid is received but not accepted.
3. **Bid Opening.** Bids shall be opened publicly and in the presence of at least one witness in addition to the Contracting Officer. An abstract of bids shall be recorded and the bids shall be available for public inspection.
4. **Award.** Award shall be made as provided in the invitation for bids by written notice to the successful bidder, as follows:
- a. **Restricted solicitations.** If the solicitation is restricted to Tribal member- and Indian-owned economic enterprises and organizations, and three or more qualified Tribal member- and Indian-owned economic enterprises or organizations submit responsive bids, award shall be made to the qualified enterprise or organization with the lowest responsive and responsible bid, provided, however, that if a Tribal member-owned enterprise or organization is within 10% of the lowest responsive and responsible bid, award shall be made to that enterprise or organization if that bid is within the maximum total contract price established for the specific project or activity being solicited. If equal low bids are received, award shall be made to the Tribal member-owned enterprise or organization; if equal low bids are received from two or more Tribal member-owned enterprises or organizations, or by two or more Indian-owned enterprises or organizations, award shall be made by drawing lots or similar random method, unless otherwise provided by applicable law. If fewer than three qualified Tribal member- or Indian-owned economic enterprises or organizations submit responsive bids, all bids shall be rejected, and CIHA shall cancel the solicitation and re-solicit, inviting bids from non-Indian as well as Indian-owned economic enterprises and organizations.

## COQUILLE INDIAN HOUSING AUTHORITY

### PROCUREMENT POLICY

---

CIHA may accept a single bid received from a responsive and responsible bidder, subject to HUD approval where required, in unusual circumstances, such as if CIHA determines that, based on a cost or price analysis, the bid price is fair and reasonable, or CIHA determines that the delay of re-soliciting would subject the project to higher construction costs or other public exigency or emergency for the requirement will not permit a delay resulting from further solicitations.

- b. **Unrestricted solicitations.** If the solicitation is not restricted to Tribal member-owned or Indian-owned economic enterprises and organizations, award shall be made to the qualified Tribal member-owned or Indian-owned economic enterprise or organizations with the lowest responsive and responsible bid, if that bid is within the maximum total contract price established for the specific project or activity being solicited and if the bid is no more than “X” higher than the total bid price of the lowest responsive and responsible bid from any qualified bidder, as set out in Appendix A hereto. If equal low bids are received from a Tribal member-owned enterprise or organization and an Indian-owned enterprise or organization, award shall be made to the Tribal member-owned enterprise or organization; if equal low bids are received from two or more Tribal member-owned enterprises or organizations, or by two or more Indian-owned enterprises or organizations, award shall be made by drawing lots or similar random method, unless otherwise provided by applicable law. If no responsive bid by a qualified Tribal member-owned or Indian-owned economic enterprise or organization is within this range, award shall be made to the lowest responsive, responsible bidder.
- c. **Mistakes in bids.** Correction or withdrawal of inadvertently erroneous bids may be permitted by written notice received in the office designated in the invitation for bids prior to the time set for bid opening. A low bidder alleging a non-judgmental mistake may be permitted to withdraw its bid if the mistake is clearly evident on the face of the bid document but the intended bid is unclear or the bidder submits convincing evidence that a mistake was made. All decisions to allow correction or withdrawal of bid mistakes shall be supported by a written determination signed by the Contracting Officer. After bid opening, no changes in bid prices or other provisions of bids prejudicial to the interest of CIHA or fair competition shall be permitted.
- d. **Rejection of bids.** CIHA may reject any or all bids if there is a sound documented reason.

#### **D. Competitive Proposals**

- 1. **Conditions for Use.** Competitive proposals (including turnkey proposals for development) may be used if there is an adequate method of evaluating technical proposals and where CIHA determines that conditions are not appropriate for the use of sealed bidding. An adequate number of qualified sources shall be solicited.

# COQUILLE INDIAN HOUSING AUTHORITY

## PROCUREMENT POLICY

---

### 2. Solicitation

- a. **General.** Requests for proposals (RFP) will be publicized, identify all evaluation factors and their relative importance, and be solicited from an adequate number of qualified sources. The RFP may be restricted to qualified Tribal member-owned or Indian-owned economic enterprises and organizations if CIHA has a reasonable expectation of receiving offers from three such entities. CIHA shall solicit proposals from non-Indian as well as Tribal member-owned or Indian-owned economic enterprises and organizations if: an insufficient number of qualified Tribal member-owned or Indian-owned economic enterprises or organizations satisfactorily respond to a restricted RFP or solicitation; or, a single proposal is received but not accepted. A mechanism for fairly and thoroughly evaluating the technical and price proposals shall be established before the solicitation is issued. Proposals shall be handled so as to prevent disclosure of the number of offers, identity of the offerors, and the contents of their proposals.
- b. **Evaluation factors.** The RFP shall clearly identify the relative importance of price and other evaluation factors and sub-factors, including the weight given to each technical factor and sub-factor. CIHA shall reserve 15% of the total number of available rating points in unrestricted solicitations for the provision of Tribal and Indian preference in the award of contracts and subcontracts, and up to an additional 10% for offers containing a qualified statement regarding training and employment of Tribal members and other Indians. The proposals shall be evaluated only on the criteria stated in the request for proposals.

3. **Negotiations.** In those situations where negotiations are deemed necessary, negotiations shall be conducted with offerors who submit proposals determined to have a reasonable chance of being selected for award, based on evaluation against the technical and price factors as specified in the RFP. Such offerors shall be accorded fair and equal treatment with respect to any opportunity for negotiation and revision of proposals. The purpose of negotiations shall be to seek clarification with regard to, and advise offerors of, the deficiencies in both the technical and price aspects of their proposals so as to assure full understanding of and conformance to the solicitation requirements. Any technical or price aspect to the RFP shall be supplied to all bidders. No offeror shall be assisted in bringing its proposal up to the level of any other proposal. Offerors shall not be directed to reduce their proposed prices to a specific amount in order to be considered for an award. A common deadline shall be established for receipt of proposal revisions based on negotiations.
4. **Award.** After evaluation of proposal revisions, if any, the contract shall be awarded to the responsive and responsible firm whose qualifications, price and other factors considered, are the most advantageous to CIHA, provided that the price is within the maximum total contract price established for the specific project or activity. For solicitations restricted to qualified Tribal member-owned or Indian-owned economic

## COQUILLE INDIAN HOUSING AUTHORITY

### PROCUREMENT POLICY

---

enterprises and organizations, if two such entities submit acceptable proposals, award shall be made to the qualified Tribal member-owned or Indian-owned economic enterprise or organization with the best proposal based on the applicable criteria, provided that the price is within the maximum total price established for the specific project or activity. If fewer than two Tribal member-owned or Indian-owned economic enterprises or organizations submits acceptable proposals, CIHA shall reject all proposals and re-solicit without restricting the RFP to qualified Tribal member-owned or Indian-owned economic enterprises and organizations. CIHA may accept a sole proposal received, subject to HUD approval where required, in unusual circumstances, such as when CIHA determines that the delays caused by re-soliciting would cause higher costs, or where CIHA determines that the proposal has a fair and reasonable price.

- 5. Rejection of Proposals.** CIHA may reject any or all proposals if there is a sound documented reason.
- 6. Architectural and Engineering Services.** Architectural and Engineering services in excess of the small purchase limitation may be obtained by the competitive proposal method of qualifications-based selection procedures. Sealed bidding shall not be used to obtain architectural and engineering services. Under qualifications-based selection procedures, competitor's qualifications are evaluated and the most qualified competitor is selected, subject to the negotiation of fair and reasonable compensation. These procedures shall not be used to purchase other types of services even though architectural and engineering firms are potential sources.

#### **E. Non-Competitive Proposals**

- 1. Conditions for Use.** Procurement shall be conducted competitively to the maximum extent possible. Procurement by non-competitive proposals may be used when the award of a contract is not feasible using small purchase procedures, sealed bids, or competitive proposals, and one of the following applies:
  - a. An emergency exists that seriously threatens the public health, welfare, or safety, or endangers property, or would otherwise cause serious injury to CIHA, as may arise by reason of flood, earthquake, epidemic, riot, equipment failure, or similar events. In such cases, there must be an immediate and serious need for supplies, services, or construction such that the need cannot be met through any other procurement methods, and the emergency procurement shall be limited to those supplies, services, or construction necessary to meet the emergency;
  - b. The procurement is for a proprietary product or service or a product or service available from only one source, and the Contracting Officer so certifies in writing;
  - c. After solicitation of a number of sources, competition is determined inadequate; or,

**COQUILLE INDIAN HOUSING AUTHORITY**  
**PROCUREMENT POLICY**

---

- d. The funding agency specifically authorizes or has approved the use of non-competitive proposals.
- 2. Justification.** Each procurement based on non-competitive proposals shall be supported by a written justification for using such procedures. The justification shall be approved in writing by the Contracting Officer.
- 3. Price Reasonableness.** The reasonableness of the price for all procurement based on non-competitive proposals shall be determined by performing a cost analysis, as described in Section F below.

**F. Cost and Price Analysis**

- 1. General.** A cost or price analysis shall be performed for all procurement actions in excess of the Simplified Acquisition Threshold (at the time of adoption, \$150,000, but may be updated at 2 C.F.R. § 200.88), including contract modifications. The degree of analysis shall depend on the facts surrounding the procurement; as a starting point CIHA will make independent estimates before receiving bids or proposals.
- 2. Submission of Cost or Pricing Information.** If the procurement is based on non-competitive proposals, or when only one offer is received, or for other procurement as deemed necessary by CIHA (e.g. when contracting for professional, consulting, or architectural and engineering services) the offeror shall be required to submit:
  - a. A cost breakdown showing projected costs and profit;
  - b. Commercial pricing and sales information, sufficient to enable CIHA to verify the reasonableness of the proposed price, such as a catalog or market price of a commercial product sold in substantial quantities to the general public; or,
  - c. Documentation showing that law or regulation sets the offered price.
- 3. Cost Analysis.** Cost analysis shall be performed if an offeror/contractor is required to submit a cost breakdown as part of its proposal. When a cost breakdown is submitted, a cost analysis shall be performed of the individual cost elements; CIHA shall have the right to audit the contractor's books and records pertinent to such costs; and, profit shall be negotiated separately in accordance with 2 C.F.R 200.323(b). Costs shall be allowable only to the extent that they are consistent with applicable federal cost principles. In establishing profit, CIHA shall consider factors such as the complexity and risk of the work involved, the contractor's investment and productivity, the amount of subcontracting, the quality of past performance, and industry profit rates in the area for similar work.

**COQUILLE INDIAN HOUSING AUTHORITY**  
**PROCUREMENT POLICY**

---

- 4. Price Analysis.** A comparison of prices shall be used in all cases other than those described in Section II(F)(3) above.

**G. Cancellation of Solicitations**

- 1.** An invitation for bids, request for proposals, or other solicitation may be canceled before offers are due if:
  - a. CIHA no longer requires the supplies, services, or construction;
  - b. CIHA can no longer reasonably expect to fund the procurement;
  - c. Proposed amendments to the solicitation would be of such magnitude that a new solicitation would be desirable; or,
  - d. CIHA determines that it is in the best interest of CIHA to cancel.
- 2.** A solicitation may be canceled and all bids or proposals that have already been received may be rejected if:
  - a. The supplies, services, or construction are no longer required;
  - b. The solicitation did not provide for consideration of all factors of significance to CIHA;
  - c. Prices exceed available funds, and it would not be appropriate to adjust quantities to come within available funds;
  - d. There is reason to believe that bids or proposals may not have been independently arrived at in open competition, may have been collusive, or may have been submitted in bad faith; or,
  - e. CIHA determines that it is in the best interest of CIHA to cancel.
- 3.** The reasons for cancellation shall be documented in the procurement file and the reasons for cancellation and/or rejection shall be provided upon request to any offerors solicited. A notice of cancellation shall be sent to all offerors solicited.

For solicitations that are not restricted to Tribal member-owned or Indian-owned economic enterprises or organizations, if all otherwise acceptable bids received in response to an invitation for bids are at unreasonable prices, or only one bid is received and the price is unreasonable, CIHA shall cancel the solicitation and re-solicit using a request for proposals.

**COQUILLE INDIAN HOUSING AUTHORITY**  
**PROCUREMENT POLICY**

---

**H. Contract Types and Options**

- 1. Contract Types.** Any type of contract (pricing arrangement) which is appropriate to the procurement and which will promote the best interests of CIHA may be used, provided that the cost-plus-a-percentage-of-cost and percentage of construction cost methods are prohibited. All contracts shall include the clauses and provisions necessary to define the rights and responsibilities of the parties. A cost reimbursement contract shall not be used, unless it is likely to be less costly or it is impracticable to satisfy CIHA's needs otherwise, and the proposed contractor's accounting system is adequate to allocate costs in accordance with applicable cost principles. A time and materials contract may be used only if written determination is made that no other contract type is suitable, and the contract includes a ceiling price that the contractor exceeds at its own risk.
- 2. Options.** Options for additional quantities or performance periods may be included in a contract, provided that:
  - a. The option is contained in the solicitation;
  - b. The option is a unilateral right of CIHA;
  - c. The contract states a limit on the additional quantities and the overall term of the contract;
  - d. The options are evaluated as part of the initial competition;
  - e. The contract states the period within which the options may be exercised;
  - f. The options may be exercised only at the price specified in or reasonably determinable from the contract; and,
  - g. The options may be exercised only if determined to be more advantageous to CIHA than conducting a new procurement.
- 3. Contract Clauses.** In addition to containing a clause identifying the contract type, all contracts shall include any clauses required by federal statutes, executive orders, and their implementing regulations, such as, but not limited to, those provided in Appendix II to 2 C.F.R. Part 200. Such clauses include, but are not limited to, the following:
  - a. Termination for convenience
  - b. Termination for default
  - c. Equal Employment Opportunity

**COQUILLE INDIAN HOUSING AUTHORITY**  
**PROCUREMENT POLICY**

---

- d. Anti-Kickback Act and Department of Labor Regulations (29 C.F.R. Part 3).
  - e. Davis-Bacon provisions of NAHASDA
  - f. Contract Work Hours and Safety Standards Act
  - g. For Contracts in excess of \$100,000 that employ mechanics or laborers, a provision for compliance with 40 U.S.C. §§ 3702 & 3704, as supplemented by Department of Labor regulations at 29 C.F.R. Part 5.
  - h. Reporting requirements
  - i. Patent rights
  - j. Copyrights and rights in data
  - k. Examination of records by CIHA, federal agencies, Comptroller General, or duly appointed staff
  - l. Retention of records for three years after close-out
  - m. Clean air and water
  - n. Energy efficiency standards
  - o. Bid protests and contracts claims
  - p. Value engineering
  - q. Payment of funds to influence certain federal transactions
  - r. For contracts more than the Simplified Acquisition Threshold, provisions addressing administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as deemed appropriate.
  - s. Anti-Lobbying Amendments
  - t. Procurement of recovered materials (2 C.F.R. § 200.322).
- 4. Forms.** If all required clauses are not included on HUD forms (e.g. HUD 5370), CIHA shall attach any additional clauses to the HUD forms used in contract documents. CIHA shall include the contract clauses and solicitation notices for Tribal and Indian preference described in Section V of this policy.

# COQUILLE INDIAN HOUSING AUTHORITY

## PROCUREMENT POLICY

---

### **I. Contract Administration**

A contract administration system designed to ensure that contractors perform in accordance with their contracts shall be maintained. It will contain guidelines for inspection of supplies, services or construction, as well as monitoring contractor performance, status reporting on construction contracts and similar matters.

### **J. Specifications**

Specifications shall be drafted to promote overall economy for the purposes intended and to encourage competition in satisfying CIHA's needs. Specifications shall be reviewed prior to solicitation to ensure that they are not unduly restrictive or represent unnecessary or duplicate items. Functional or performance specifications are preferred. Detailed product specifications shall be avoided when possible. Consideration shall be given to consolidating procurement to obtain a more economical purchase. For equipment purchases, a lease versus purchase analysis should be performed to determine the most economical form of procurement.

**1. Limitations.** Specification limitations that are inconsistent with applicable law and regulations, including but not limited to the following, shall be avoided:

- a. Geographic restrictions not mandated or encouraged by applicable federal law (except for architect-engineer contracts, which may include geographic location as a selection factor if adequate competition is available);
- b. Unnecessary bonding or experience requirements;
- c. Brand name specifications unless a written determination is made that only the identified item will satisfy CIHA's needs; and,
- d. Brand name or equal specifications, unless they list the minimum essential characteristics and standards to which the item must conform to satisfy its intended use.

Nothing in this policy shall preempt any applicable State, Tribal or local licensing laws. Specifications shall be scrutinized to ensure that organizational or other conflicts of interest, as defined by Tribal Code and applicable federal laws, do not occur.

## **III. CONTRACTOR QUALIFICATIONS AND DUTIES**

### **A. Contractor Responsibility**

Procurement shall be conducted only with responsible contractors, i.e. those who have the technical and financial competence to perform and who have a satisfactory record of integrity. Before awarding a contract, CIHA shall review the proposed contractor's ability to perform the contract successfully, considering factors such as the contractor's

# COQUILLE INDIAN HOUSING AUTHORITY

## PROCUREMENT POLICY

---

### **I. GENERAL PROVISIONS**

#### **A. Purpose**

The purpose of this Procurement Policy is to provide for the fair and equitable treatment of all persons or firms involved in purchasing by the Coquille Indian Housing Authority (CIHA); assure that supplies, services, and construction are procured efficiently, effectively, and at the most favorable prices available to CIHA; promote competition in contracting; provide safeguards for maintaining a procurement system of quality and integrity; and, assure that CIHA purchasing actions are in full compliance with applicable law.

#### **B. Application**

This policy applies to all contracts for the procurement of supplies, services, and construction entered into by CIHA; however, nothing in this policy shall prevent CIHA from complying with the terms and conditions of any grant, contract, gift, or bequest that is otherwise consistent with law. When both HUD and non-HUD funds are used for a project, the work to be accomplished may be separately identified by the applicable source of funds and HUD's regulations applied to the work financed by HUD; if it is not feasible to separate funds, then HUD's regulations shall be applied to the total project. The term procurement, as used in this policy, includes both contracts and change orders for construction or services, as well as purchase, lease, or rental of supplies and equipment.

#### **C. Procurement Authority and Administration**

- 1. Contracting Officer.** All procurement transactions shall be administered and executed by the Contracting Officer, who shall be the Executive Director or other individual he or she has authorized in writing. The Executive Director shall establish operational procedures to implement this policy. The Executive Director shall enact sanctions for violations of the ethical standards described in Section VI below, consistent with applicable law and CIHA policy.
- 2. Executive Director Duties.** The Executive Director or his/her designee shall ensure that:
  - a. Procurement requirements are subject to an annual review process to assure efficient and economical purchasing.
  - b. Contracts and modifications are in writing, clearly specifying the desired supplies, services, or construction and are supported by sufficient documentation regarding the history of the procurement, including at a minimum the method of procurement chosen, the selection of the contract type, the rationale of selecting or rejecting offers, and the basis for the contract price;

**COQUILLE INDIAN HOUSING AUTHORITY**  
**PROCUREMENT POLICY**

---

- c. For procurement other than small purchases, public notice is given of each upcoming procurement at least 10 calendar days before a solicitation is issued; responses to such notice are honored to the maximum extent practical; a minimum of 15 calendar days for main construction contracts and 15 calendar days for other contracts is provided for preparation and submission of bids or proposals; and, notice of contract award is made available to the public;
- d. Solicitation procedures are conducted in full compliance with federal standards stated in 2 C.F.R §§ 200.317-326, the Indian preference requirements and methods of procurement in accordance with the applicable NAHASDA regulations, except where such standards have been superseded by Tribal law (see Coquille Tribal Code §160.200(6)(c), Tribal preference requirements), and consistent with Appendix A;
- e. An independent cost estimate is prepared before issuance of solicitation and is appropriately safeguarded for each procurement above the small purchase limitation, and a cost or price analysis is conducted of the responses received for all procurement;
- f. There are sufficient unencumbered funds available to cover the anticipated cost of each procurement before contract award or modification (including change orders), work is inspected before payment, and payment is made promptly for contract work performed and accepted;
- g. A contract administration system is maintained to ensure that contractors perform in accordance with their contracts and provide for the proper inspection of supplies, services, or construction, as well as monitoring contractor performance, status reporting, and similar matters; and,
- h. CIHA complies with applicable HUD or other funding requirements, as well as applicable Tribal law and regulations and other applicable CIHA policies and procedures.

**D. Cooperative Purchasing**

CIHA may enter into interagency agreements to conduct direct procurement based on economy and efficiency. If used, an interagency agreement shall stipulate who is authorized to purchase on behalf of the participating parties and shall specify inspection, acceptance, termination, payment, and other relevant terms and conditions. CIHA may utilize governmental excess and surplus property programs instead of purchasing new equipment and property if suitable for the purpose of the procurement.

**COQUILLE INDIAN HOUSING AUTHORITY**  
**PROCUREMENT POLICY**

---

**V. PREFERENCE REQUIREMENTS**

**A. Small Businesses**

**1. Required Efforts.** To the extent consistent with and not superseded by applicable law and regulations, and specifically the Tribal preference requirements set out herein and the Indian preference requirements set out in the NAHASDA regulations at 24 C.F.R. 1000.48 - .52, CIHA shall make efforts to ensure that small and minority firms, women's business enterprises, labor surplus area firms, and individuals located in or owned substantially by persons residing in the area of a CIHA project are used when possible. Such efforts shall include, but shall not be limited to:

- a. Including such firms, when qualified, on solicitation mailing lists;
- b. Encouraging their participation through direct solicitation of bids or proposals whenever they are potential sources;
- c. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by such firms;
- d. Establishing delivery schedules, where the requirement permits, which encourage participation by such firms;
- e. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and,
- f. Including in contracts a clause requiring contractors, to the greatest extent feasible, to provide opportunities for training and employment for lower income residents of the project area and to award subcontracts for work in connection with the project to business concerns which are located in, or owned in substantial part by persons residing in the area of the project; and,
- g. Requiring prime contractors, when subcontracting is anticipated, to take the steps listed in 1(a) through 1(f) above.

**2. Definitions**

- a. A small business is defined as a business which is independently owned, not dominant in its field of operation, and not an affiliate or subsidiary of a business dominant in its field of operation. The size standards in 13 C.F.R. § 121 shall be used unless CIHA determines that their use is inappropriate.
- b. A business concern located in the area of the project is defined as an individual or firm located within the relevant Section 3 covered project area, as determined pursuant to 24 C.F.R. § 135.5 and meeting the definition of small business above.

## COQUILLE INDIAN HOUSING AUTHORITY

### PROCUREMENT POLICY

---

A business concern owned in substantial part by persons residing in the area of the project is defined as a business concern which is 51% or more owned by persons residing within the Section 3 covered project, considered by the U. S. Small Business Administration to be socially or economically disadvantaged, and meeting the definition of small business above.

#### **B. Tribal and Indian Preference Requirements**

- 1. General.** Projects developed and operated with assistance under NAHASDA are subject to Section 7(b) of the Indian Self-determination and Education Assistance Act (25 U. S. C. 450e(b)). Section 7(b) provides that to the greatest extent feasible, preference shall be given to Indian organizations and Indian-owned economic enterprises in the award of all contracts and subcontracts. However, NAHASDA and its applicable regulations also provide that “Notwithstanding any other provision of law, with respect to any grant (or portion of a grant) made on behalf of an Indian tribe under [NAHASDA] that is intended to benefit 1 Indian tribe, the tribal employment and contract preference laws (including regulations and tribal ordinances) adopted by the Indian tribe that receives the benefit shall apply with respect to the administration of the grant (or portion of a grant).” (25 U.S.C. 4111(k)). The Coquille Indian Tribe has adopted Tribal contract preference requirements in its Fiscal Management Ordinance, Coquille Tribal Code, §160.200(6)(c). Thus, the Tribal preference requirements must be applied first, and only if there is no Tribal contractor who meets those requirements would the Indian preference requirements apply. Preference must be provided in accordance with the methods set forth in NAHASDA and consistent with 2 C.F.R. Part 200. Where Tribal and Indian preference is determined not to be feasible, CIHA shall document the procurement file with the basis for its findings. Tribal and Indian preference applies not only on Coquille Tribal Lands or elsewhere within CIHA’s jurisdiction, but also to contracts with firms that operate outside these areas. Tribal and Indian preference in the solicitation, evaluation, and award process shall be as described above.
- 2. Eligibility.** Eligibility for Tribal preference shall be established in accordance with Coquille Tribal Code Section 160.200(6)(c). Eligibility for Indian preference shall be established in accordance with procedures consistent with NAHASDA. If CIHA or its prime contractor determines an applicant ineligible for Tribal or for Indian preference, CIHA or the prime contractor shall notify the applicant in writing before contract award, or filling the position, or providing the desired training.
- 3. Contract Clauses and Solicitation Notices.**
  - a. Solicitations shall include the following information:
    - i. A statement of the applicability of Tribal and Indian preference to the solicitation and a time before the due date for offers by which offerors must submit evidence of eligibility for Tribal or Indian preference;

**COQUILLE INDIAN HOUSING AUTHORITY**  
**PROCUREMENT POLICY**

---

- ii. Any applicable locally imposed preference requirements properly enacted by the tribal governing body and adopted by CIHA (or advise offeror to contact the tribal governing body to determine any applicable preference requirements);
- iii. Information as to whether CIHA maintains lists of Tribal- or Indian-owned economic enterprises and Tribal or Indian organizations by trade specialty which are available to contractors and subcontractors for use in meeting Tribal and Indian preference responsibilities;
- iv. A requirement that offerors provide a statement describing how they will provide Tribal and Indian preference in subcontracting, training and employment, including the number or percentage of Tribal members and Indians to be employed and trained;
- v. CIHA's description of the information to be submitted on Tribal and Indian preference;
- vi. The factors that CIHA will use in judging the adequacy of the Tribal or Indian preference information submitted;
- vii. A statement that failure to submit the required Tribal and Indian preference statements on subcontracting, training, and employment shall be grounds for rejection of the offer;
- viii. A requirement that each contractor and subcontractor submit a certification and supporting evidence to CIHA whenever it is not feasible to provide Tribal or Indian preference in subcontracting;
- ix. For requests for proposals that are not restricted to Tribal member-owned or Indian-owned economic enterprises or organizations, the percentage or number of points set aside for Tribal or Indian preference and the method for allocating these points;
- x. For requests for proposals that are not restricted to Tribal member-owned or Indian-owned economic enterprises or organizations, a requirement that contractors using a request for proposals to solicit subcontractors reserve 15% of the available rating points for Tribal and for Indian preference in subcontracting and the criteria to be used in evaluating subcontractor proposals, with the award to go to the Tribal member-owned economic enterprise or organization over the Indian-owned entity if the points are otherwise the same; and,
- xi. A requirement that offerors submit a list of core crew employees with their offers and that contractors and subcontractors are required to provide

## COQUILLE INDIAN HOUSING AUTHORITY

### PROCUREMENT POLICY

---

preference to the greatest extent feasible by hiring qualified Tribal members and other Indians in all positions other than core crew positions.

- b. Solicitations, contracts, and subcontracts shall include the following:
  - i. A reference to the applicability of Tribal preference requirements consistent with this policy and Coquille Tribal Code §160.200(6)(c);
  - ii. The clause implementing Section 7(b) of the Indian Self-Determination and Education Assistance Act in connection with the development or operation of CIHA projects in accordance with 24 C.F.R. § 1000.52 as this provision currently exists or is subsequently amended;
  - iii. The grounds for termination of a contract or the imposition of penalties for improper subcontracting or false certification as to subcontracting with Tribal member-owned or Indian-owned economic enterprises or organizations; and,
  - iv. Any additional information required because of the nature of the project.
- c. If all required clauses and provisions are not included on form documents (e.g. HUD-5369 and HUD-5370), then CIHA shall attach any additional clauses or provisions to the forms used in solicitations and contract documents.

- 4. Monitoring and Remedies.** CIHA shall monitor the implementation of Tribal and Indian preference in its contracts, subcontracts, training, and employment, and take appropriate remedial action (including cancellation of contracts and assessments of penalties) to ensure compliance.

## VI. ETHICS IN PUBLIC CONTRACTING

### A. General

CIHA shall adhere to the following code of conduct and shall comply with the limitations imposed by NAHASDA and other applicable law, consistent with 2 C.F.R Part 200.

### B. Conflict of Interest

The Coquille Indian Housing Authority prohibits its officers, employees, and agents from participating directly or indirectly in the selection or in the award or administration of any contract if a conflict, real or apparent, would be involved. Such conflict would arise when a financial or other interest in a firm selected for award is held by:

- 1. An officer, employee, or agent involved in making the award;
- 2. His/her relative, including father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law,

## COQUILLE INDIAN HOUSING AUTHORITY

### PROCUREMENT POLICY

---

daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, and half-sister;

3. His/her partner; or,
4. An organization which employs, is negotiating to employ, or has an arrangement concerning prospective employment of any of the above.

#### **C. Gratuities, Kickbacks, and Use of Confidential Information**

CIHA officers, employees, or agents shall not solicit or accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties of subcontracts, and shall not knowingly use confidential information for actual or anticipated personal gain.

#### **D. Prohibition against Contingent Fees**

Contractors shall not retain a person to solicit or secure a CIHA contract for a commission, percentage, brokerage, or contingent fee, except for bona fide employees.

#### **E. Consequences for Violating Code of Conduct**

Employees, officers, and agents of CIHA who engage in the award and administration of contracts shall abide by the provisions of this Section, which establishes a code of conduct for carrying out procurement activities.

1. **Disciplinary Action Against Employee Violating Code of Conduct.** Any employee of CIHA who violates any provision of this code of conduct will be subject to disciplinary action, up to and including termination from employment, depending on the severity of the violation.
2. **Disciplinary Action Against Officer or Agent Violating Code of Conduct.** Any officer or agent of CIHA who violates any provision of this code of conduct will be subject to disciplinary action, up to and including removal from office or termination of contractual or other relationship, depending on the severity of the violation.
3. **Civil Action to Recover Any Improper Financial Benefit from Employee, Officer, or Agent Violating Code of Conduct.** CIHA may seek repayment from an employee, officer, or agent of the Housing Authority of any improper financial benefit that the employee, officer, or agent gained for him- or herself or for another person through such violation, which may include filing suit against the employee, officer, or agent in a court of competent jurisdiction for such repayment. Where the matter involves an employee or former employee, such action may be taken in addition to or in lieu of disciplinary action against the employee.

# COQUILLE INDIAN HOUSING AUTHORITY

## PROCUREMENT POLICY

---

### APPENDIX A: TRIBAL AND INDIAN PREFERENCE

In accordance with this statement, awards shall be made under **unrestricted sealed bid** solicitations to the lowest responsive bid from a qualified **Tribal member-owned** economic enterprise or organization within the maximum total contract price established for the specific project or activity being solicited, if the bid is no more than “X” higher than the total bid price of the lowest responsive bid from any qualified bidder. The factor “X” is determined as follows:

<u>When the lowest responsive and responsible bid is:</u>	<u>X = the lessor of:</u>
Less than \$100,000	10% of that bid or \$9,000
At least \$100,000 but less than \$200,000	9% of that bid or \$16,000
At least \$200,000 but less than \$300,000	8% of that bid or \$21,000
At least \$300,000 but less than \$400,000	7% of that bid or \$24,000
At least \$400,000 but less than \$500,000	6% of that bid or \$25,000
At least \$500,000 but less than \$1 million	5% of that bid or \$40,000
At least \$1 million but less than \$2 million	4% of that bid or \$60,000
At least \$2 million but less than \$4 million	3% of that bid or \$80,000
At least \$4 million but less than \$7 million	2% of that bid or \$105,000
\$7 million or more	1% of the lowest responsive bid with no dollar limit

In accordance with this statement, awards shall be made under **unrestricted sealed bid** solicitations to the lowest responsive bid from a qualified **Indian -owned** economic enterprise or organization within the maximum total contract price established for the specific project or activity being solicited, if the bid is no more than “X” higher than the total bid price of the lowest responsive bid from any qualified bidder. The factor “X” is determined as follows:

<u>When the lowest responsive and responsible bid is:</u>	<u>X = the lessor of:</u>
Less than \$100,000	5% of that bid or \$4,500
At least \$100,000 but less than \$200,000	4.5% of that bid or \$8,000
At least \$200,000 but less than \$300,000	4% of that bid or \$10,500
At least \$300,000 but less than \$400,000	3.5% of that bid or \$12,000
At least \$400,000 but less than \$500,000	3% of that bid or \$12,500
At least \$500,000 but less than \$1 million	2.5% of that bid or \$20,000
At least \$1 million but less than \$2 million	2% of that bid or \$30,000
At least \$2 million but less than \$4 million	1.5% of that bid or \$40,000
At least \$4 million but less than \$7 million	1% of that bid or \$52,500
\$7 million or more	.5% of the lowest responsive bid with no dollar limit



## Coquille Indian Housing Authority

---

2678 Mexeye Loop • Coos Bay, OR 97420



# Annual Performance Report

for the fiscal year ended

**SEPTEMBER 30, 2018**

*Submitted to HUD NWONAP December 27, 2018*

---

(541) 888-6501 • (800) 988-6501 • FAX (541) 888-8266

**SECTION 9: TRIBAL WAGE RATE CERTIFICATION**  
(NAHASDA §§ 102(b)(2)(D)(vi) and 104(b))

By signing the IHP, you certify whether you will use tribally determined wages, Davis-Bacon wages, or HUD determined wages. Check only the applicable box 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:

**SECTION 10: 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.):**Following is the full text of the Housing Authority's FY 2018 Self-Monitoring Assessment*

October 19, 2018

Coquille Tribal Council  
North Bend, OR 97459Coquille 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 October 19, 2018 covering the program year 2018. 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 staff utilized the HUD Office of Native American Programs Monitoring Plan checklists to complete the assessment. A new checklist was added to this year's assessment to evaluate the Authority's ongoing compliance with IRS requirements applicable to the tax-exempt bond financing obtained for the Projects and Maintenance Operations and Storage Facility.

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	Tracey Mueller, Housing Programs Specialist
Lyman Meade, Deputy Director	Marcy Chytka, Accounting Services Coordinator
Debbie Dennis, Administrative Services Coordinator	Scott Felton, Maintenance Coordinator
Dale Herring, Housing Programs Coordinator	Scott Platter, Maintenance Technician

**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 – Warehouse Project      | 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**

Deputy Director Lyman Meade interviewed Anne Cook, Executive Director, to review the Authority's IHP and APR compliance. He also reviewed the files and documents which addressed this area. No recommendations, concerns, or findings were noted in this area.

**2. Organization and Structure**

Deputy Director Lyman Meade 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 area, but the following management improvement is suggested:

**Recommendation****Authority's Policies Could Be Improved**

The Authority's policies are re-examined each year against any new statutory and procedural requirements to ensure they are compliant with current HUD rules and regulations. In all areas addressed by this self-monitoring assessment it was noted that its policies and procedures address the Authority's obligation to comply with NAHASDA rules and regulations.

While, as noted above, its existing policies and procedures comply with statutory requirements, the Authority is encouraged to continue updating and improving its policies during the upcoming year.

**3. Environmental Review**

Deputy Director Lyman Meade interviewed Anne Cook, Executive Director, to review the Authority's environmental review compliance. He examined the Authority's environmental review records which addressed all applicable areas requiring environmental review.

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

**4. Other Programs – Warehouse Project**

The Consultant interviewed Anne Cook, Executive Director, to review the status of the Authority's warehouse project.

As stated in the prior year's report, this project required an exceptional amount of preplanning to ensure that it fulfilled its intended purpose. The warehouse was completed in December and its tenants, both the Tribe and the Housing Authority, have found its innovative design to be both practical and attractive for its users. The Consultant commends the Tribe and Authority on the success of this project. Both should take great pride for such a remarkable achievement.

**5. Financial and Fiscal Management**

Maintenance Coordinator Scott Felton and Deputy Director Lyman Meade interviewed Marcy Chytka, Accounting Services Coordinator, to determine present procedures.

Tests were conducted and documents were reviewed to determine present procedures and compliance with standards for financial reporting, maintaining accounting records, cash management, allowable costs, insurance, internal controls, separation of duties, and tax-exempt bond compliance.

Mr. Felton noted that the Consultant, in performing monthly readings of the financial statements, reported no adverse comments concerning their accuracy and the most recent annual financial audit reported no findings. Mr. Felton and Mr. Meade found no exceptions in their tests of the financial management systems.

No concerns or findings were noted in this area.

### **Recommendations**

#### **Allocation of Payroll Expenses**

With the completion of the warehouse, the Authority returned to the payroll allocation levels used prior to the project. It is recommended that a new time study be performed to ensure these percentages accurately reflect the Authority's current distribution of effort.

#### **Requirement to Calculate Program Income on the Cash Basis**

The FY 2012 Self-Monitoring Report noted that 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 is aware of this requirement and continues to monitor this area for significant changes. Accounting for this area will be converted to the cash basis if tenant receivable balances warrant such a change.

### **6. Procurement and Contract Administration**

Housing Programs Coordinator Dale Herring interviewed Debbie Dennis, Administrative Services Coordinator, to determine present procedures. It was noted that the Authority's outside auditors also review this area during the annual financial audit. Mr. Herring tested all procurements over \$5,000 to determine if proper procedures were used for expenditures in excess of the Authority's micro purchase policy.

These tests revealed that all procurements over this threshold were properly documented and followed the solicitation method required by the Authority in all instances. In addition, based on the reviewer's tests of those purchases made within the micro purchase policy, it was evident that the Authority attempted to purchase from multiple sources to achieve competitive pricing of products. The Authority should be commended on this practice as it reflects the realization that the \$5,000 requirement is mandated, but the conscientious practice of getting the best price for the Authority's funds is the real goal.

There were no contracts or purchases that exceeded the small purchase threshold in the period.

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

### **7. Labor Standards and Construction Management**

Housing Services Coordinator Dale Herring interviewed Debbie Dennis, Administrative Services Coordinator, to determine present procedures. The Authority uses HUD-determined or Davis-Bacon wage rates as dictated by the type of work. Mr. Herring reviewed certified payrolls where required by the type of work to substantiate that the Authority was following required procedures in this area. These were tested to ensure compliance with Davis-Bacon requirements. No exceptions were noted in this review.

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

**8. Relocation and Real Property Acquisition**

No activity occurred during the period.

**9. Lead-Based Paint**

Maintenance Technician Scott Platter interviewed Dale Herring, Housing Programs Coordinator, to determine present procedures. The units of all participants in the Monthly Housing Assistance Payments (MHAP) tenant-based rental assistance program that have children under the age of six in the household and live in homes built before 1978 require testing for lead-based paint issues. One unit required lead-based paint testing during the period, was inspected by a qualified inspector, and passed inspection.

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

**10. Section 504 Accessibility**

In prior self-monitoring engagements, it was noted that the Authority has compliance issues with respect to its conformity with Section 504 accessibility rules. A legal review revealed that in the initial construction of the reservation units in the 1990s, the Authority did not build the number of Section 504 compliant units to meet the requirements of this statute.

The Authority has three compliant units (the number required by regulation), two of which are rented and one of which is leased under a lease-purchase contract. Although the Authority is in technical compliance with 504 rules, it is the Authority's intent to continue to work toward providing at least one additional 504-compliant rental unit as funds become available or appropriate units become vacant that can be rehabilitated into 504-compliant unit(s).

In the interim, in accordance with 24 CFR 8.4 (b) (1), other actions will be taken to ensure residents with needs under the Act receive specific modifications to their units as necessary.

**11. Maintenance and Inspection**

Housing Programs Technician Tracey Mueller interviewed Debbie Dennis, Administrative Services Coordinator and Scott Platter, Maintenance Technician.

Files were randomly selected for review to determine if annual inspections had been conducted on all rental and homebuyer units as required, and if annual preventive maintenance (APM) was occurring on all rental units. All units selected had been inspected at least once in the previous year and annual preventive maintenance work had been completed or scheduled. The forms used for these inspections are thorough and provide accurate information for work orders to be issued, when necessary.

Work orders were randomly selected for review to determine if work requested was completed. The list of open work orders was reviewed; there were minimal work orders open at the time. Maintenance staff were focused on exterior APM work while weather allowed and preparing vacant units for re-occupancy.

The computerized tracking of work orders, inspections, and preventive maintenance helps to ensure that timely maintenance of units occurs to maintain the integrity of the units. The system has promoted efficient use of resources, quick responses to resident's requests for service and repairs, and overall improved maintenance of the physical units.

It was noted that maintenance of the Authority's vehicles, common areas, and other buildings and facilities were tracked using the system as well.

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

## 12. IHBG Self-Monitoring

The Consultant interviewed Anne Cook, Executive Director, to review the Authority's self-monitoring program. Five years ago, HUD monitored the Authority's self-monitoring program and noted that the program was exemplary. The comprehensive approach taken by the Authority continues to address all areas of compliance mandated by HUD and as necessitated by other program activities.

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

## 13. Admissions and Occupancy

Maintenance Technician Scott Platter interviewed Dale Herring, Housing Programs Coordinator, to determine present procedures. During the most recent financial audit, the Authority's outside auditors examined at least  $\frac{1}{3}$  of the files from each category and found no exceptions; therefore, additional testing was limited in this area. Ten random files were tested and found to be in compliance with no exceptions.

No concerns or findings were noted in this area, but the following management improvement is suggested:

### Recommendation

#### Interest Should Be Charged on Payback Agreements

While provision is made in policy for the addition of interest to payback agreements, this has not been interpreted into practice. It is recommended that the Authority implement this provision of its policy to offset the costs of offering this option to participants.

## 14. Subrecipient Agreements

The Authority has no subrecipient agreements.

### CONCLUSION

The Consultant and Monitoring Committee concur that the IHBG program is well managed and substantially in compliance with the requirements of NAHASDA. There is one item of special interest that should be noted. The Authority has continued to exert exemplary control over resident receivables. In the current fiscal year, the increase in Tenant Accounts Receivable (TARs) was 4%, which, although higher than the Authority's usual rate, remains a significant accomplishment in subsidized housing.

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

Respectfully submitted,

**JWILLIS INC. and the Monitoring Committee**

## Anne Cook

---

**From:** Harper, Bryce F <Bryce.F.Harper@hud.gov>  
**Sent:** Tuesday, April 30, 2019 4:30 PM  
**To:** anneshane@coquilleiha.org  
**Cc:** Harper, Bryce F; Stewart, Lisa  
**Subject:** Coquille | 2018 Audit

Dear Ms. Cook:

On 03/22/2019, the Federal Audit Clearinghouse (FAC) accepted the Coquille Indian Housing Authority's financial audit for Fiscal Year Ended (FYE) 09-30-2018. The purpose of this email is to notify you that NwONAP has completed its review of the audit and no findings related to HUD programs were identified. Please note that if you have any questions, contact Bryce Harper, Grants Evaluation Specialist, at (206) 220-6219, or by email at Bryce.F.Harper@hud.gov; or Lisa Stewart, Grants Management Specialist, at (206) 220-6415, or by email at Lisa.Stewart@hud.gov.

Sincerely,

Bryce Harper  
Grants Evaluation Specialist  
Northwest Office of Native American Programs  
U.S. Department of Housing and Urban Development  
P:(206) 220-6219  
F:(206) 220-5234  
[www.hud.gov/nwonap](http://www.hud.gov/nwonap)  
[Sign up](#) for the NwONAP Listserv

## Anne Cook

---

**From:** ERD FAC <govs.fac.ides@census.gov>  
**Sent:** Monday, March 25, 2019 7:04 AM  
**To:** GISKRA@ISLERCPA.COM; ANNECOOK@COQUILLEIHA.ORG  
**Subject:** Single Audit Submission Accepted - COQUILLE INDIAN HOUSING AUTHORITY (2018), Report ID: 796410

FAC ACCEPTED DATE: 3/22/2019

AUDITEE NAME: COQUILLE INDIAN HOUSING AUTHORITY REPORT ID: 796410 FISCAL YEAR END DATE: 9/30/2018

The Single Audit submission for the above referenced organization has been accepted by the Federal Audit Clearinghouse (FAC). No further action is needed.

Your FAC Accepted Date is: 3/22/2019. Please retain this e-mail for your records.

Sincerely,  
Federal Audit Clearinghouse  
<https://harvester.census.gov/facides>  
[govs.fac.ides@census.gov](mailto:govs.fac.ides@census.gov)

## **Rating Factor 2 Supporting Attachments**

### **Rating Factor 2.1**

HUD FY 2020 Formula Response Form	2-8
Relevant Excerpts from 2018 Coos County Housing Study	9-14
Relevant Excerpts from FY 2020 Indian Housing Plan	15-16
Relevant Excerpts from FY 2018-2022 CIHA Strategic Plan	17-20

### **Rating Factor 2.2**

Current Waiting List	21-22
Relevant Excerpts from Admissions and Occupancy Policy	23-31

### **Section 2.5**

Relevant Excerpts from 2018 Empire Comprehensive Plan	32-35
Relevant Excerpts from Low Rent Maintenance Policy	36-42

**Coquille Indian Tribe  
Formula Area**

In accordance with §1000.302 Formula Area (1)...."Formula Areas are:"

1. Reservations for federally recognized Indian tribes, as defined by the U.S. Census;
2. Trust lands;
3. Department of the Interior Near-Reservation Service Areas;
4. Former Indian Reservation Areas in Oklahoma Indian Areas, as defined by the U.S. Census as Oklahoma Tribal Statistical Areas (OTSAs);
5. Congressionally Mandated Service Areas;
6. State Tribal Areas as defined by the U.S. Census as State Designated American Indian Statistical Areas (SDAISAs);
7. Tribal Designated Statistical Areas (TDSAs);
8. California Tribal Jurisdictional Areas established or reestablished by Federal court judgment; and
9. Alaska formula areas described in §1000.302 Formula area (4).

Formula areas may include additional geographic units if the Tribe demonstrates that it is providing substantial housing services in accord with §1000.302 Formula area (2) & (3) and §1000.302 substantial housing services.

The geographic areas currently contained in your Formula Area are listed below.

<b>Formula Area</b>	<b>Estimated Change in American Indian and Alaska Native (AIAN) population since 2010 Census</b>
Coquille Reservation, OR-Coos County, Oregon+	8.55%
Balance - Coos County, Oregon+	8.55%
Balance - Curry County, Oregon+	29.09%
Balance - Douglas County, Oregon+	12.59%
Balance - Jackson County, Oregon+	19.34%
Balance - Lane County, Oregon+	24.19%

A "+" next to a geographic area listed above indicates that the area overlaps with other tribe(s). For overlapping areas, be sure to review the information in the next section "Overlapping Formula Areas." Balance of county refers to any land in a county outside reservations or trust lands.

If any of these areas do not meet the above criteria or are not covered under §1000.302 Formula area (2), please make changes and corrections in Appendices B1 and B2.

If you wish to request other geographic areas beyond those identified above to be added to your Tribe's Formula Area, please complete the Formula Area table in **Appendices B1 and B2**. HUD will review this submission based on §1000.302 Formula area (2) & (3) and §1000.302 substantial housing services and determine whether or not to include these areas. HUD will make its judgment using as its guide whether this addition is fair and equitable for all tribes receiving a formula allocation. Please note that if Formula Area expansions are approved based on substantial housing services, tribes must continue to provide investment

# **FY 2020 Formula Response Form**

Indian Housing Block Grant Formula Data

U.S. Department of Housing  
and Urban Development  
Office of Native American Programs

OMB Approval No. 2577-0218  
(exp. 07/31/2019)

---

levels consistent with the definition of substantial housing services in accordance with §1000.302 substantial housing services (2).

## **Coquille Indian Tribe Overlapping Formula Areas**

**Only for tribes with a "+" next to the geographic area  
(see previous section on Formula Area)**

In cases where tribes are overlapped, Needs data (population and household) for the entire Formula Area of all tribes involved in the overlap are shared. If your Formula Area is overlapped, you are likely receiving a share of the Needs data for areas beyond those listed as being part of your Tribe's Formula Area.

Currently, your Tribe is sharing Needs data as a result of overlapping Formula Areas with the following tribes:

**Coos, Lower Umpqua and Siuslaw Confederated Tribes  
Cow Creek Band of Umpqua Tribe  
Fort Bidwell Indian Community  
Grand Ronde Confederated Tribes  
Karuk Tribe  
Klamath Tribes  
Quartz Valley Indian Community  
Siletz Confederated Tribes  
Tolowa Dee-ni' Nation (Smith River Rancheria)  
Yurok Tribe**

HUD uses Bureau of Indian Affairs (BIA) estimates for Total Resident Service Area Indian Population (TRSAIP) to proportionately allocate Needs data to the affected tribes.

**The TRSAIP being used for your Tribe is: 5,186**

If you wish to correct your Tribe's TRSAIP, please contact your BIA Area Office. HUD will only accept written correspondence from the BIA to correct TRSAIP figures (see Appendix D to the document "*Challenging U.S. Decennial Census Data: Guidelines for the Indian Housing Block Grant Formula*" available through the IHBG Formula Customer Service Center).

HUD recognizes that tribes may be able to provide better data for overlapping areas. Therefore, HUD is requesting that each tribe provide its Tribal Enrollment within each of the geographic areas described in the preceding section as overlapping.

If all tribes in an overlapping area submit corrected information to HUD, HUD will then use this information to divide the funds for the affected area. Otherwise, HUD will continue to use the BIA TRSAIP estimates to make the allocations. On the form in Appendix C, list the overlapping geographic area (indicated earlier under the Formula Area section by a "+" next to the geographic area) and your Tribe's enrollment in the area.

**Coquille Indian Tribe**  
**Tribal Enrollment & Formula Area Population Cap**

In accordance with §1000.302 (5), Tribal Enrollment is used to cap AIAN persons in calculating Needs data. A cap is placed at twice Tribal Enrollment. If there is a "\*" next to "AIAN persons" in the Needs section, your Tribe's data have been "capped."

**The enrollment being used for your Tribe (or Alaska Village or Corporation) is: 1,087**

If your Tribe's enrollment is different than what is listed above, please follow the instructions in Appendix D for correcting your Tribe's enrollment.

If a cap has been applied to your Tribe and you are providing housing services to more than twice as many AIAN members of other tribes as members of your own Tribe, please follow the instructions in Appendix D for correcting your Tribe's Population Cap.

Please note that Formula Area Population Cap Adjustments must be submitted on an annual basis to the IHBG Formula Customer Service Center for approval. The requests must be postmarked or faxed by August 1 of this year.

## Coquille Indian Tribe Needs Data

Listed below are the data currently being used to calculate the Needs component of your Tribe's allocation based on your Tribe's "Formula Area" (see Formula Area section of this document).

The data used are from a special tabulation. This tabulation:

- Counts individuals reported as AIAN. The AIAN person count variable comes from the Decennial Census and is aged using Census population estimates. For the FY 2010 Decennial Census, data for reservations, trust lands, and remote Alaska will receive an undercount adjustment of 4.88%. For all other Needs variables, in FY 2020 HUD will use the 5-year rolling average from 2011 to 2015 ACS data. The ACS data will be updated every year. Therefore, in FY 2021, the ACS data will be from 2012 to 2016. These data sources apply unless tribes have approved Census Challenges in place. **No, your Tribe does not have an approved Census Challenge.**
- The FY 2020 estimate is calculated with the Needs component based on single race (AIAN alone) Census data and multi-race (AIAN alone and in combination with other race(s)) Census data. The amount of the allocation for each Indian tribe was determined to be the greater of the two resulting allocation amounts.

The growth adjustment factor and the undercount adjustments used for your Formula Area are listed next to each Formula Area in the table listing your tribe's Formula Area.

After adjusting for population growth and undercount, sharing of Needs data among tribes in cases of overlapping Formula Areas and application of the Population Cap (see note below), your tribe's Needs component is based on **single-race data**. The Needs data are:

AIAN persons:	<b>*2,174</b>
AIAN households with annual income less than 30% of median income:	<b>141</b>
AIAN households with annual income between 30% and 50% of median income:	<b>131</b>
AIAN households with annual income between 50% and 80% of median income:	<b>142</b>
AIAN households which are overcrowded or without kitchen or plumbing:	<b>52</b>
AIAN households with housing cost burden greater than 50% of annual income:	<b>171</b>
Housing Shortage (number of low-income AIAN households less total number of NAHASDA and Current Assisted Stock):	<b>357</b>

Note: If there is a "\*" next to "AIAN persons" above, the Tribe's data have been "capped." This occurs when the AIAN population in the Tribe's service area is greater than twice its total Tribal Enrollment.

If you think these data do not reflect your Needs:

- Check to see if the Formula Area, as listed previously, is correct for your Tribe. If the Formula Area is not correct, submit that correction.

## FY 2020 Formula Response Form

Indian Housing Block Grant Formula Data

U.S. Department of Housing  
and Urban Development  
Office of Native American Programs

OMB Approval No. 2577-0218  
(exp. 07/31/2019)

- Check to see if the Formula Area for your Tribe overlaps that of another tribe. If it does, you may wish to contact the IHBG Formula Customer Service Center to obtain detailed information on how the Needs data are being shared.
- If you still disagree, you may wish to submit a Census challenge. To determine if submitting a Census challenge would be appropriate for your Tribe, please review the *FY 2020 Needs Data* above and the *FY 2021 Needs Data* on Attachment A for a full presentation on the Needs data available for your tribe, and then read the document "*Challenging U.S. Decennial Census Data: Guidelines for the Indian Housing Block Grant Formula*" at: [https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/ih/codetalk/onap/ihbgformula](https://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/ih/codetalk/onap/ihbgformula).

## Attachment A: FY 2021 Indian Housing Block Grant (IHBG) Needs Data

The Needs data which will be used to estimate your Fiscal Year (FY) 2021 Indian Housing Block Grant (IHBG) formula allocation are shown below:

Need Variable	Adjusted 2010 Decennial Census and 2012 to 2016 American Community Survey		Tribe Submitted Census Challenge (if applicable)	
	Single Race	Multi Race	Single Race	Multi Race
American Indian and Alaska Native (AIAN) persons*	2,289	4,818	N/A	N/A
AIAN households with annual income less than 30% of median income	148	373	N/A	N/A
AIAN households with annual income between 30% and 50% of median income	137	324	N/A	N/A
AIAN households with annual income between 50% and 80% of median income	139	353	N/A	N/A
AIAN households which are overcrowded or without kitchen or plumbing	51	130	N/A	N/A
AIAN households with housing cost burden greater than 50% of annual income	159	422	N/A	N/A
<p>* The Decennial Census AIAN population data is adjusted for undercounts on reservation/trust lands and for remote Alaska. It is also adjusted for population change through FY 2017 based on the most recent Census county-level population projections. Since the 2018 Census county-level population projections are not currently available, further adjustments to the FY 2021 Needs data are likely to be reported on your Tribe's FY 2021 Formula Response Form.</p> <p><b>Note:</b> The Housing Shortage Needs variable is not shown because it is based on the sum of low-income households less the total number of Current Assisted Stock (CAS), and CAS is not provided on this document for review. However, it will be provided on your Tribe's FY 2021 Formula Response Form.</p>				

All of the data above reflects the total Needs for your Formula Area prior to the application of the population cap. Therefore, these figures may be much higher than the amounts shown on your Tribe's Formula Response Form. If you share Formula Area with other tribes, the data shown are your share of the Needs data in your combined overlapping Formula Areas.

If you have an approved Census challenge it will be shown in the table above, and that data will be used unless the Tribe specifically requests a return to the standard Census data set prior to March 30, 2020. If you believe you have an approved Census challenge but it is not shown in the table above, please contact the IHBG Formula Customer Service Center.

# Coos County, OR

# HOUSING ANALYSIS AND ACTION PLAN

2018



HOUSING ANALYSIS AND ACTION PLAN  
FOR COOS COUNTY, OREGON

Performed by czbLLC



## PART 1

# COOS COUNTY MARKET CONTEXT

**Demographically and economically, Coos County has been challenged since before the turn of the century.**

Coos County's economic and demographic trends make its rising home values a curious story. Some important common drivers of rising property values are population, job, and income growth, but Coos County has experienced none of those. The county's population peaked in 1980, declined slightly by 2000, and remained flat over the next decade and a half. Employment has been on the decline with roughly 1,500 fewer county residents employed in 2016 than in 2000. Some of this may be related to job loss, as the county did lose jobs during that period. But a better explanation for a lack of employment is people leaving the workforce as they age. Coos County's median age increased from 43.1 to 48.2 years old between 2000 and 2016. The percentage of residents aged 62 and older grew from 22.5% to 29.5%. As the population has gotten older and less likely to be working, and the county has not added new jobs to replace those that have disappeared, incomes have failed to keep pace with inflation.



Housing costs have increased significantly despite a static population and declining workforce.



This is partially attributable to

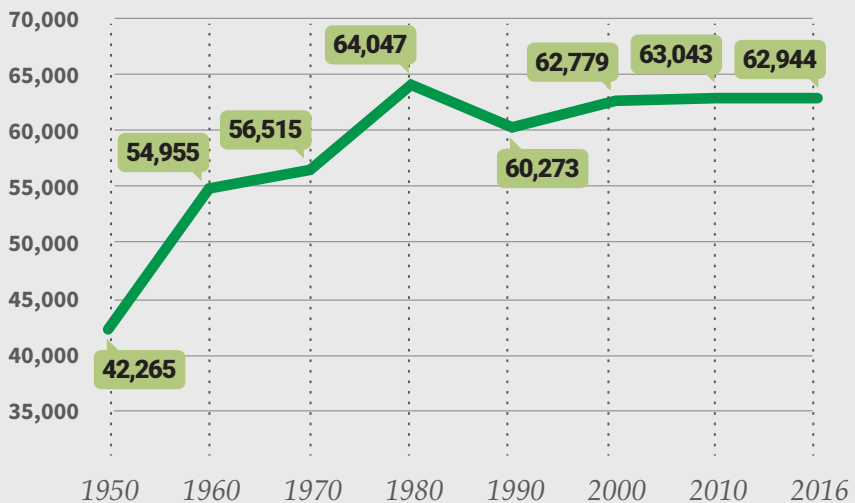
A mirroring of national real estate trends

Increased recognition of the area's geographic beauty

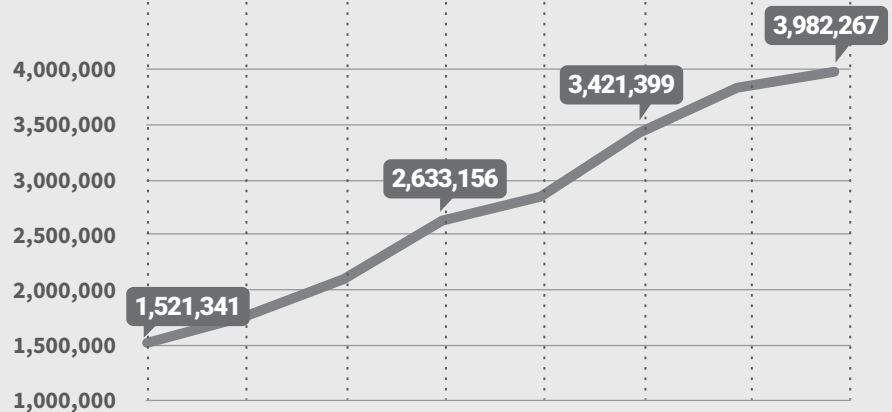
Ongoing speculation in the vacation house market that is slowly discovering the south coast of Oregon

Population, 1950-2016

COOS COUNTY



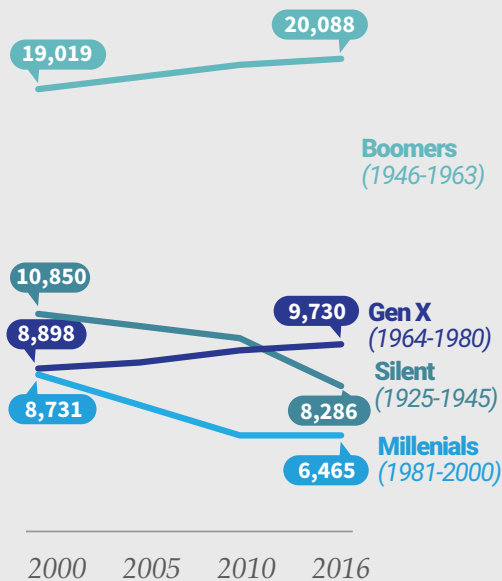
OREGON



## Baby Boomers Sticking Around

A notable phenomenon in the county is the extent to which those in the Baby Boomer generation (born approximately 1946-1964) have not only failed to decrease in number as they have begun to move into their retirement years, but have actually grown in number since 2000. Their presence, along with the lack of younger new arrivals, explains the growing median age in the county.

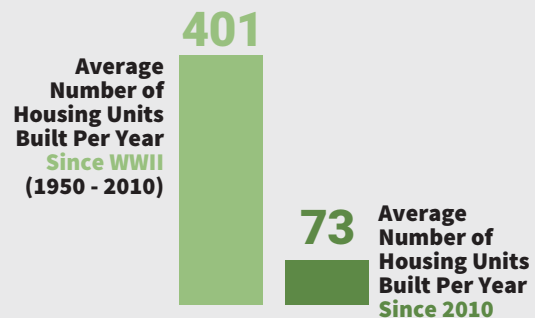
Age Cohorts in Coos County



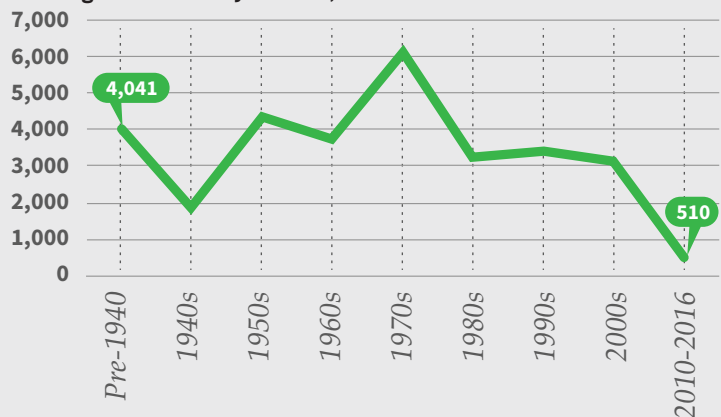
## Housing Production and Sales

Based on the lack of population growth, stagnant incomes, and an aging population with little need for new homes, it is no surprise that housing production has nearly ground to a halt. Continuous building through the 1980s, 1990s, and early 2000s, in the absence of more people, or some other type of demand, meant that the market would become saturated at a certain point. What is more interesting is that recent sales trends appear to be decoupled from local conditions. Despite the lack of change in population and employment, residential sales from 2000 to 2016 mirrored national trends with a peak in sales volume and prices just before the recession, a marked dip beginning in 2008, and a steady climb in the years following. The median sales price has not recovered to its 2007 peak, but it is on its way.

Number of Housing Units Built Per Year in Coos County

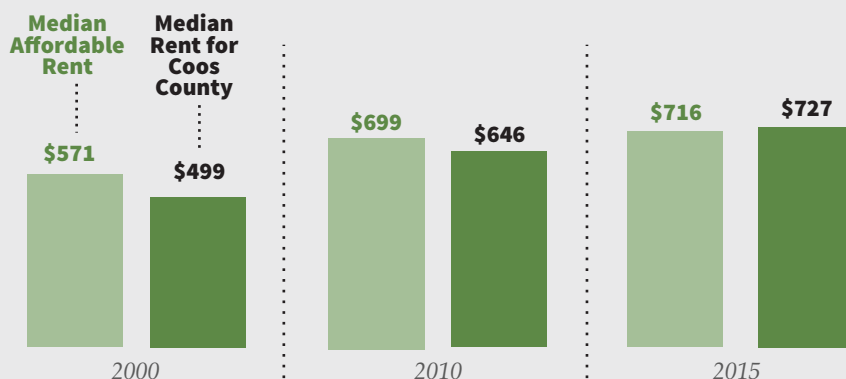


Housing Units Built by Decade, 1940-2016





### Coos County Renter Affordability, 2000-2016



## RENTAL MARKET

According to historical data and the most recent countywide data available via the 2012-2016 American Community Survey 5-year estimates, Coos County has long been a fairly affordable rental market. Only recently has the median rent in the county surpassed the median renter household's ability to pay it. Anecdotal information and an informal survey of rental listings indicate, however, that rents may now be increasing more quickly.

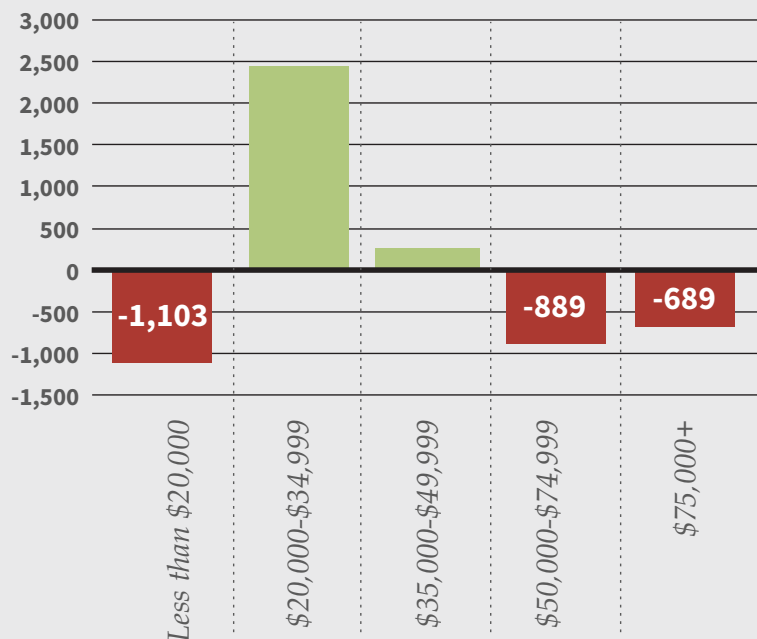
## RENTAL GAP ANALYSIS

There is a deficit of rental units affordable to all groups except those earning \$20,000 - \$35,000 (and a small surplus for those earning \$35,000 - \$50,000). In short, Coos County is mostly a \$500 to \$1,000 per month rental market (with some availability in the \$1,000 - 1,500 per month market).

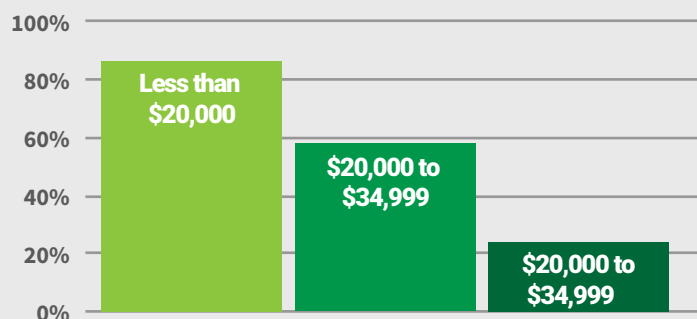
For renter households earning more than \$35,000, such a breadth of choice between \$500 and \$1,000 makes Coos Bay an affordable area in which to rent.

For renter households earning less than \$20,000, being forced into the same \$500-\$1,000 price range means paying more for housing than they can afford. czb calculates that the county is short roughly 1,100 units for those earning less than \$20,000.

### Gap between Renter Households and Rental Units for Households by Income



### Coos County Cost Burdened Renters (2016)



## COST BURDENED RENTERS

Renters with low incomes solve their housing problem in one of a few ways. First, they accept the smallest and lowest quality units available. Second, they may share housing costs by joining with other renters as roommates. Third, they may simply pay what it costs even though they are unable to afford it. Indeed, nearly 90% of low-income renters in Coos County are cost-burdened, meaning they spend more than 30% of their income on housing expenses.

## PART 3

TAKING  
ACTION

## A Primer to the Action Plan for Coos County

### Two seemingly contradictory housing and housing-related realities require attention in Coos County.

#### The Market Overall is Stuck and Too Costly For Many

In simplest terms, there is no affordable housing crisis in Coos County. There is a shortage of quality rental units for any household earning less than \$35,000 annually, and a shortage of affordable home ownership options until annual household income is at least \$75,000. This is a situation that has been found to be a reality in soft markets with aging housing stocks, older households, trouble keeping and attracting young families, declining school enrollment, and tight vacancy rates. Such markets are stuck, will continue to suffer disinvestment, and as they get closer to the demographic cliff that's inevitable, soon have to confront not prohibitive and rising housing costs and cost burdens, but excess supply and accelerated disinvestment.

#### Coos Faces an Existential Threat from Looming Disinvestment

As costly as housing is for many, especially for those earning less than \$25,000 annually (who are almost always single wage earner households), there is a greater - and arguably far greater - problem of general market softness for any part of the county not presently desirable for households with the ability to afford \$500,000 and more for a home. In other words, minus a few areas of the county where demand for ocean front or similar locations command high prices, what's left are areas terribly vulnerable to disinvestment, falling demand, falling values, declining confidence, shrinking tax base, rising concentrations of poverty, decreases in owner occupancy, vacancy, and even abandonment. This, and not affordable housing is the real challenge Coos County must mobilize the community to tackle.



## Coquille Indian Housing Authority

---

2678 Mexeye Loop • Coos Bay, OR 97420



# Indian Housing Plan

for the fiscal year ending

**SEPTEMBER 30, 2020**

*Submitted to HUD NWONAP June 24, 2019*

---

(541) 888-6501 • (800) 988-6501 • FAX (541) 888-8266

**ONE YEAR PLAN & ANNUAL PERFORMANCE REPORT****SECTION 2: HOUSING NEEDS**

(NAHASDA § 102(b)(2)(B))

- (1) **Type of Need:** Check the appropriate box(es) below to describe the estimated types of housing needs and the need for other assistance for low income Indian families (column B) and all Indian families (column C) inside and outside the jurisdiction.

(A) Type of Need	Check All That Apply	
	(B) Low income Indian Families	(C) All Indian Families
(1) Overcrowded Households	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Renters Who Wish to Become Owners	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Substandard Units Needing Rehabilitation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Homeless Households	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(5) Households Needing Affordable Rental Units	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(6) Student Housing	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(7) Disabled Households Needing Accessibility	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(8) Units Needing Energy Efficiency Upgrades	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(9) Infrastructure to Support Housing	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(10) Other (specify below)	<input type="checkbox"/>	<input type="checkbox"/>

- (2) **Other Needs** (Describe the "Other" needs below. Note: this text is optional for all needs except "Other."):

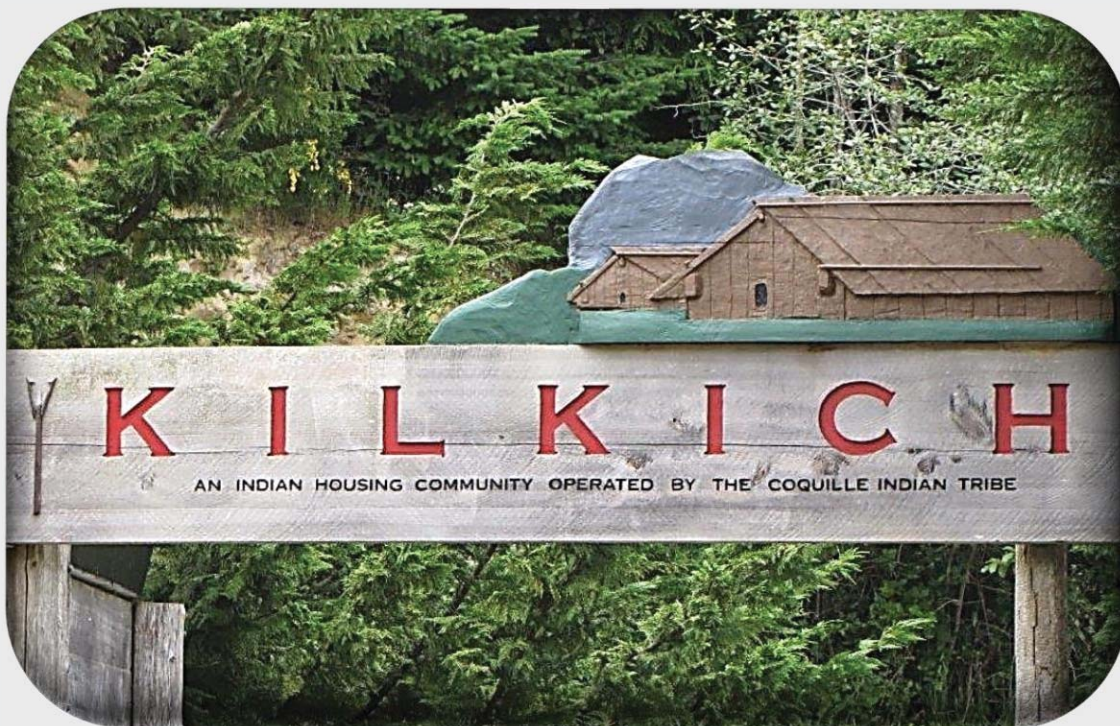


## Coquille Indian Housing Authority

2678 Mexeye Loop • Coos Bay, OR 97420

(541) 888-6501 • (800) 988-6501 • FAX (541) 888-8266

[www.coquilleiha.org](http://www.coquilleiha.org)



# STRATEGIC PLAN

## FY 2018 – FY 2022

## COQUILLE INDIAN HOUSING AUTHORITY

### FY 2018 – FY 2022 STRATEGIC PLAN

---

*To the extent resources are available, our goals are to:*

#### ◆ **GOAL 1. Provide rental opportunities to qualified Coquille Tribal members, employees, and interns, other Native Americans, and Alaska Natives.**

- ◆ Objective 1.1: Continue to operate income-indexed Low Rent Program units on Tribal Lands for qualified low- to moderate-income Tribal members and other Native Americans and Alaska Natives.
- ◆ Objective 1.2: Create a Market Rate Rental Program on Tribal Lands to serve qualified Tribal members, employees, and interns of all income levels.
- ◆ Objective 1.3: Acquire or develop market rate rental units on Tribal Lands.
- ◆ Objective 1.4: Designate an area within the Kilkich community for development of tiny homes.
- ◆ Objective 1.5: Support Tribal designation of a location on Tribal Lands for development of income-indexed rental units to serve the independent living needs of Coquille Tribal elders and persons with disabilities.
- ◆ Objective 1.6: Support Tribal designation of a location on Tribal Lands for development of income-indexed rental units to serve the transitional housing needs of Coquille Tribal members.
- ◆ Objective 1.7: Support Tribal designation of an area within the Kilkich cranberry bogs for future development of mixed income housing units.
- ◆ Objective 1.8: Continue to operate income-indexed tenant-based rental assistance within the U.S. for low- to moderate-income Tribal members.
- ◆ Objective 1.9: Continue to operate income-indexed tenant-based rental assistance within the Tribe's federally-designated service area for low- to moderate-income Native Americans and Alaska Natives.
- ◆ Objective 1.10: Support appropriation of Tribal funds to expand income-indexed tenant-based rental assistance within the U.S. for low- to moderate-income Tribal members.
- ◆ Objective 1.11: Support appropriation of Tribal funds for tenant-based rental assistance for low- to moderate-income Tribal employees and interns to rent market rate rental units on Tribal Lands.

**COQUILLE INDIAN HOUSING AUTHORITY**  
**FY 2018 – FY 2022 STRATEGIC PLAN**

---

*To the extent resources are available, our goals are to:*

♦ **GOAL 3. Maintain, modernize, and rehabilitate housing units and facilities owned or operated by CIHA.**

- ♦ Objective 3.1: Inspect housing units and facilities regularly to determine maintenance, modernization, and rehabilitation needs.
- ♦ Objective 3.2: Evaluate methods and associated cost to soundproof four-plex units.
- ♦ Objective 3.3: Perform routine and periodic maintenance as scheduled.
- ♦ Objective 3.4: Perform periodic maintenance on CIHA office.
- ♦ Objective 3.5: Perform emergency and non-routine maintenance as needed.
- ♦ Objective 3.6: Prepare units for re-occupancy in a timely manner.
- ♦ Objective 3.7. Provide accessibility features and reasonable accommodation for persons with disabilities as required or financially feasible.
- ♦ Objective 3.8. Modernize and rehabilitate units and facilities as needed.

**COQUILLE INDIAN HOUSING AUTHORITY**  
**FY 2018 – FY 2022 STRATEGIC PLAN**

---

*To the extent resources are available, our goals are to:*

♦ **GOAL 5. Facilitate access to services that support the self-sufficiency, wellbeing, and success of those participating or seeking to participate in housing programs.**

- ♦ Objective 5.1. Support the location of Tribal services that promote self-sufficiency, wellbeing, and individual success within easy access of the Kilkich housing community.
- ♦ Objective 5.2. Provide rental space to Tribal programs and community partners that directly promote the self-sufficiency, wellbeing, and success of Kilkich residents.
- ♦ Objective 5.3. Design, estimate cost, and seek funding for construction of an activities center for use by adult members of the Kilkich community and Tribal elders.
- ♦ Objective 5.4. Provide support for Kilkich Residents Association meetings and activities that build capacity within the organization and foster a sense of community identity, mutual respect, and individual responsibility for community success.
- ♦ Objective 5.5. Provide compliance and performance incentives to Kilkich residents.
- ♦ Objective 5.6. Maintain partnerships with Tribal and other community social and support service providers and make referrals as necessary.
- ♦ Objective 5.7. Encourage practices and living habits that reduce maintenance costs, improve housekeeping, and promote household health and safety.
- ♦ Objective 5.8. Counsel current and prospective homebuyers on maintenance and financial responsibilities.

## Waiting Lists

### New Applicants

During the month, **10** applications were completed.

#### Applicants

- **4 Coquille:** 2 applied for LR and MHAP; 1 eligible, 1 filed inactive due to lack of contact. 2 applied for MHAP; eligible.
- **6 Non-Coquille:** 1 applied for EH, LR, and MHAP; 1 eligible. 1 applied for LR; 1 conditionally eligible due to outstanding utilities. 4 applied for LR and MHAP; 1 eligible, 3 filed inactive due to lack of contact.

*Applicants found conditionally eligible due to outstanding utilities or amounts owed to landlords are provided guidance on becoming fully eligible. When documentation is received showing that a repayment agreement is in place or a balance has been cleared, the applicant is placed on the waiting list.*

#### Low Rent

Coquille families	1
CLUSI families	1
Other Native families	15
<b>Total</b>	<b>17</b>

#### Emergency Housing

Coquille families	0
CLUSI families	0
Other Native families	1
<b>Total</b>	<b>1</b>

#### MHAP

Coquille families - ISA	2
Coquille families - OSA	5
CLUSI families	1
Other Native families	19
<b>Total</b>	<b>27</b>

Of the 27 unduplicated families on the new applicant waiting list; **7** are Coquille.

### Transfers

**5** current participants have requested and been approved for transfer to a different program or unit.

#### Different Program

- 1 Non-Coquille: MHAP 1-bedroom to LR 1-bedroom
- 2 Non-Coquille: MHAP 3-bedroom to LR 3-bedroom
- 1 Non-Coquille: MHAP 4-bedroom to LR 4-bedroom

#### Different Unit

- 1 Non-Coquille LR 3-bedroom to LR 4-bedroom
- 

### Other Activities

- Continued work with Tribal Attorney to enable PRL applicant to use VA Native American Direct Loan program.
- Continued assisting 1 Coquille family with transition from LR to HomeGO.

## FY 2019 Coquille Applicant Summary

### **Low Rent**

Eligible	4
Conditionally eligible	3
3 Debts to landlords/utilities	
Ineligible	1
- Over income	
- Criminal background	
1 Habits and practices	
Unable to contact	1
<b>Total</b>	<b>9</b>

### **MHAP – ISA**

Eligible	12
Conditionally eligible	4
4 Debts to landlords/utilities	
Ineligible	-
- Over income	
- Other	
Unable to contact	7
<b>Total</b>	<b>23</b>

### **Emergency Housing**

Eligible	-
Conditionally eligible	-
- Debts to landlords/utilities	
Ineligible	-
- Over income	
- Criminal background	
- Habits and practices	
Unable to contact	-
<b>Total</b>	<b>-</b>

### **MHAP – OSA**

Eligible	3
Conditionally eligible	1
1 Debts to landlords/utilities	
Ineligible	-
- Over income	
- Other	
Unable to contact	-
<b>Total</b>	<b>4</b>

Of the 22 unduplicated families who have applied year to date, 16 were eligible for one or more programs, 5 were conditionally eligible, and 1 could not be contacted. None were ineligible.



# COQUILLE INDIAN HOUSING AUTHORITY



## ADMISSIONS & OCCUPANCY POLICY

### TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
GLOSSARY OF TERMS .....	2
SECTION 1: PURPOSE .....	5
SECTION 2: APPLICATIONS & ELIGIBILITY .....	5
SECTION 3: WAITING LIST .....	10
SECTION 4: SELECTION OF FAMILIES.....	11
SECTION 5: USE OF THE HOME.....	12
SECTION 6: INCOME .....	13
SECTION 7: CERTIFICATION AND RECERTIFICATION OF INCOME.....	16
SECTION 8: DEDUCTIONS .....	16
SECTION 9: REQUIRED MONTHLY PAYMENTS .....	17
SECTION 10: PROGRAM TRANSFERS.....	18
SECTION 11: UNIT INSPECTIONS .....	19
SECTION 12: HOMEBUYER RESPONSIBILITY FOR MAINTENANCE.....	20
SECTION 13: COUNSELING.....	21
SECTION 14: PROGRAM VIOLATIONS .....	22
SECTION 15: TERMINATION .....	24
SECTION 16: MONTHLY EQUITY PAYMENT ACCOUNT (MEPA) USE .....	24
SECTION 17: HOMEBUYER SUBLEASE POLICY .....	25
SECTION 18: SUCCESSORSHIP.....	29
SECTION 19: PURCHASE PRICE, PURCHASE PRICE SCHEDULE AND TRANSFER OF OWNERSHIP .....	32
APPENDIX A: AVERAGE MEDIAN INCOME .....	34
APPENDIX B: SELECTION PREFERENCE SCORING.....	35
APPENDIX C: SELECTION CRITERIA FOR UNIT BEDROOM SIZE .....	37
APPENDIX D: SOCIAL SECURITY NUMBER PROCEDURES .....	38
APPENDIX E: PROCEDURES FOR VACATING UNITS.....	40

# **COQUILLE INDIAN HOUSING AUTHORITY**

## **ADMISSIONS & OCCUPANCY POLICY**

---

### **SECTION 1: PURPOSE**

This Admissions and Occupancy Policy of the Coquille Indian Housing Authority (CIHA) provides direction to staff for admission of applicants into the housing program and for administering the requirements governing their occupancy. Staff will encourage and accept applications from all interested parties. After determining eligibility, staff will maintain waiting lists of potential renters and Homebuyer applicants according to the pertinent selection criteria as outlined in this policy. These waiting lists will be used by staff in selecting Tenants and Homebuyers.

The Board of Commissioners and staff will comply with all applicable regulations of the Department of Housing and Urban Development (HUD). These policies will be updated as needed to assure consistency with those regulations.

Under the provisions of the Indian Civil Rights Act, all persons involved in this program are assured due process and equal treatment.

In accordance with Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794), no otherwise qualified individual with disabilities shall solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subject to discrimination under this program.

### **SECTION 2: APPLICATIONS & ELIGIBILITY**

ALL PROGRAMS ARE OPERATED TO FIRST SERVE THE NEEDS OF MEMBERS OF THE COQUILLE INDIAN TRIBE, THEN TO SERVE MEMBERS OF THE CONFEDERATED TRIBES OF THE COOS, LOWER UMPQUA AND SIUSLAW INDIANS AND THEN OTHER INDIANS. THE MUTUAL HELP HOMEBUYER PROGRAM IS AVAILABLE ONLY FOR THE BENEFIT OF MEMBERS OF THE COQUILLE INDIAN TRIBE. All interested persons are to be encouraged to submit applications. They are to be advised that financially assisted housing units are assigned using the Selection Preferences. If all preferences are equal, the earliest application date will control. They also must be informed that if they need assistance in completing the application, staff is available to assist them. Families must submit a full and complete application, including authorizations, before they can be determined eligible or be placed on a waiting list. The staff member receiving the application will also place their initials next to the date stamped on the application.

The application form will be designed by staff to gather enough information to allow a full assessment of the family's eligibility, consistent with federal and housing authority requirements that apply at the time of submission.

## COQUILLE INDIAN HOUSING AUTHORITY

### ADMISSIONS & OCCUPANCY POLICY

---

The following eligibility requirements must be met prior to persons being selected into the program:

- A. They must be an Indian family. Indian is defined as any person recognized as being an Indian or Alaska Native by a Tribe, the federal government, or any state. At least one member of the family must be Indian. This must be verified by a family member submitting a copy of a BIA Certificate of Degree of Indian Blood (CDIB), enrollment verification, or a Tribal Enrollment Card.
- B. Family means two or more persons related by blood, marriage or adoption, or who have evidenced a stable family relationship by living regularly together in the same dwelling unit for at least six months or who have a child in common, and includes families consisting of a single disabled person, a person displaced by governmental action, and the remaining member of a participant family. Also, a single person living alone may be a family.
- C. A non-Indian family may receive housing assistance by the CIHA if the non-Indian family's housing needs cannot be reasonably met without such assistance and the CIHA determines that the presence of that family within the CIHA community is essential to the well-being of Indian families, except that non-Indian families residing in housing assisted under the 1937 Act do not have to meet these requirements for continued occupancy.
- D. The applicant family must have an annual income at, or below, income limits established and approved by HUD (See Appendix A: Income Limits). Exceptions may only be made by the Executive Director from waiting lists and consistent with E, below.
- E. No more than ten percent of the annual grant amounts will be used to assist families where income exceeds the income limits.
- F. A Homebuyer applicant's family income must be high enough so the combined total costs of:
  - 1) The current administrative charge of \$\_\_\_\_\_ to cover the CIHA's cost of operations,
  - 2) the costs for utilities, based on the latest Utility Allowances, and
  - 3) routine and non-routine maintenance expenses for the life of the MHO Agreement (currently estimated at \$100/month) do not exceed 30% of adjusted family income. In rare circumstances, and only with documented additional counseling by staff, may an applicant family be selected if these projected housing costs would exceed that 30 percent amount. The family must convince the Executive Director that it can and will pay the administration charge and meet its other obligations under the MHO Agreement. The Executive Director will base his decision on demonstrated family history and individual family circumstances which would make it reasonable for him to

**COQUILLE INDIAN HOUSING AUTHORITY**  
**ADMISSIONS & OCCUPANCY POLICY**

---

assume that the family would be able to fully meet the obligations of homebuying, such as:

- a. Documented family income from sources that are not counted towards computation of adjusted monthly income, i. e. per capita payments.
- b. The family's ability to supplement income by providing its own foods, fuel, or other necessities.
- c. The family's previous monthly housing payment record and utility payments records showing payments made in excess of the projected monthly housing cost.

If selected, the family will be required to sign a statement verifying that they are aware that they are below income and that they feel they are able to meet and maintain the payment calculated by staff and estimated long term maintenance expenses (currently \$100/month). The family will be required to participate in additional financial management counseling.

- G. For an applicant to be financially eligible for the homebuying program, he must also demonstrate the ability to maintain at least his present level of income. This will be verified by staff and may be satisfied by a written statement from the potential Homebuyer's employer. If it is not feasible to determine income potential from an employer, this verification may come from photocopies of the applicant's income tax returns for the three years prior to the first application. These income tax returns will be kept in a file and new ones must be submitted each year thereafter until the applicant is placed in a unit. Failure to provide the CIHA with this information will result in the applicant being dropped from the Homebuyer waiting list.
- H. For a family to be eligible for admission to the Low Rent housing program, they must be willing and able to meet all contractual obligations of the lease.
- I. To be admitted, a single pregnant woman must have an income at or below the income limit for one person. In establishing the appropriate space standards, staff must consider the size of the household with the unborn child included. However, the single pregnant woman would not be entitled to the benefit of the \$480 dependent allowance until after the birth of the child.
- J. Eligibility of single persons in the process of adopting an individual under age 18 is to be determined identically to a single pregnant woman; but persons in the process of securing legal custody through other means must provide evidence of a reasonable likelihood of success to be admitted to occupancy prior to obtaining custody. This determination of reasonable likelihood of success will be made at the time an offer of a unit is to be made to an individual. If at that time it is determined that there is not a reasonable likelihood of success, then that individual nonetheless shall be allowed to retain his place on the waiting list, with any preference for which he remains eligible and with his original date and time of

**COQUILLE INDIAN HOUSING AUTHORITY**  
**ADMISSIONS & OCCUPANCY POLICY**

---

application until custody is secured. At that time the individual will be offered an appropriate unit in accordance with his position on the waiting list.

- K. To remain on the waiting list, applicants must inform staff in writing of any changes in income, as they occur. Staff will reassess eligibility of the applicant based on any change of income and ensure that the applicant meets all eligibility requirements for admission. Should an applicant become ineligible based on a change in income, staff will notify the applicant in writing that he no longer qualifies for admission into the program. In addition to income changes, disqualification may also be caused by program and policy changes. In cases where annual income is seasonal or sporadic, a three-year average of income will be used for the family member whose income cannot otherwise be determined.
- L. All applicants must have a satisfactory credit, use and maintenance history.
- 1) Credit history will be verified by one or all of these sources:
    - a. Credit reporting agency;
    - b. two or more landlord references detailing rental payment history;
    - c. all credit references provided by the applicant's adult household members; or
    - d. other assisted housing providers.
  - 2) Use and maintenance history will be documented by two or more landlord references detailing history of any unit damage.

If negative references on either the credit or use/maintenance history are obtained, staff will notify the applicant in writing of the negative items found. The applicant will be afforded an opportunity to respond in writing on any negative information derived from any source. The response will be taken into consideration in determining the applicant's eligibility.

Lack of credit or use/maintenance history (as opposed to a poor history) is not sufficient justification to reject an applicant. Staff will take into consideration the time, nature and extent of the past occurrences and the reasonable probability of future favorable performance by the applicant. Staff will not charge applicants for the costs involved in the application.

- M. Applicant information will be verified as soon as possible after submission of an application. However, if the CIHA has a long waiting list, staff may do an initial assessment of a family's eligibility and suitability at the time of application and wait to do a more complete evaluation until shortly before admission. By doing this, staff will avoid the time and expense involved in evaluating applicants who may withdraw from the waiting lists before their names can be reached.

**COQUILLE INDIAN HOUSING AUTHORITY**  
**ADMISSIONS & OCCUPANCY POLICY**

---

- N. To be eligible, the families must disclose and verify social security numbers for all family members over the age of six years, per 24 CFR 5 Subpart B.
- O. The applicant must terminate other assisted unit agreements before the applicant will be allowed to execute a Lease or MHO Agreement with the CIHA.

**Ineligibility**

Applicants may also be determined to be ineligible for one or more of the following:

- Having a history of habits and practices that may be expected to have a detrimental effect on other residents or on the housing project; such as a history of disturbing the neighbors, destroying property, or living or housekeeping habits which would affect adversely the health, safety or welfare of other residents. This evaluation will also include the applicant's history of criminal activity, especially drug related or violent crimes. Staff may consider an applicant's arrest record, but will be careful about making a determination based solely on an arrest record if no conviction followed. A criminal record will not automatically exclude an applicant from consideration and staff will determine whether the person would be a suitable resident;
- failing to repay previous debts owed to any Housing Authority or other HUD programs, or to a utility company;
- committing fraud in connection with any HUD program, or failing to disclose previously committed fraud in connection with any HUD program;
- providing false information on the application;
- not cooperating (refusing or failing to complete required forms or to supply requested information); and/or
- appearing on HUD's List of Suspensions, Debarments, and Limited Denials of Participation.

Families who have applied for housing, and who, for any reason, have been determined to be ineligible will be notified by staff in writing, stating the reasons for their ineligibility. The notification shall inform the applicant that he may request an informal review of the decision to deny eligibility if the applicant believes the action taken by CIHA is taken in error, or if he believes the information that the denial is based on is incorrect. The applicant shall be informed that the review must be requested, in writing, within 10 days of receipt of the notification and that the request must explain why the applicant believes the decision was made in error. The informal review shall be conducted by a person of the CIHA staff who did not make the decision to deny eligibility. Results of the informal review shall be provided to the applicant within 10

## **COQUILLE INDIAN HOUSING AUTHORITY**

### **ADMISSIONS & OCCUPANCY POLICY**

---

working days of his request for a review. All information relative to the rejection of an applicant family, except for information required to be kept confidential, must be documented and placed in the applicant family's file for future reference.

#### **Confidentiality**

In all existing housing programs, families are required to reveal personal information about themselves and their finances that most citizens are allowed to keep private, and usually choose to keep private. In many ways housing residents become vulnerable to harm through others' gossip and ridicule if information about them is not kept confidential by staff. They do not give up their right to privacy, simply because they are participating in a housing authority program. Staff will respect applicants and residents by keeping all information about them in strictest confidence, using it only when necessary in their work. Violation of confidentiality is grounds for immediate dismissal of the offending staff member.

#### **SECTION 3: WAITING LIST**

A. General - Staff will maintain separate waiting lists of eligible Coquille Indian Tribal Members and of other eligible applicants for rental and Homebuyer housing. Staff will take into consideration the following factors prior to placing an applicant family on the waiting list (see Selection Preference Scoring, page 30):

- 1) number of family members,
- 2) determination of bedroom size needed, and
- 3) determination of need for a handicapped accessible unit.

Staff will place the applicant family on the waiting list appropriate to the program applied for, number of bedroom sized unit needed, and if there is a need for a handicapped accessible unit. The need for a handicapped accessible unit will be determined by information derived from the application. Staff will not determine the need for a handicapped accessible unit based solely on visual contact with the applicant. Staff will consider other applicable factors such as selection and placement of the applicant family on the waiting list.

B. Eligible applicants - For each applicant found to be eligible for admission, staff will establish a file containing at least the following material:

- 1) Application,
- 2) verification documents,

**COQUILLE INDIAN HOUSING AUTHORITY**  
**ADMISSIONS & OCCUPANCY POLICY**

---

- 3) copies of staff's Notification of Eligibility, and
  - 4) all correspondence and memoranda regarding the applicant.
- C. Managing waiting lists - Staff will update waiting lists at least annually. Each applicant will be contacted to update his application, and staff will reaffirm the applicant's eligibility, interest and need for housing.

**SECTION 4: SELECTION OF FAMILIES**

Family selection will be made by staff from the top of the waiting lists of eligible applicants. Final approval of selected applicants will be made by the Executive Director prior to execution of the lease or MHO Agreement. The rating of each applicant will be done at the time of application and may be revised whenever family circumstances change. In selecting participants for the program, staff will take into consideration the following factors:

- A. Selection Preferences (formerly listed as Federal Preferences in 24 CFR 950.304-7): First preference shall be given to Coquille Indian Tribal members and then members of the Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians and then other eligible Indian applicants. An applicant qualifies for a Selection Preference if:
- 1) The applicant has been involuntarily displaced and is not living in standard, permanent replacement housing, or within no more than six months from the date of certification or verification, the applicant will be displaced (as defined in 24 CFR Part 5.420);
  - 2) the applicant is living in substandard housing (as defined in 24 CFR Part 5.425); or
  - 3) the applicant is paying more than 50% of family income for rent (as defined in 24 CFR Part 5.430);
  - 4) the applicant family lives with the five county service area;
  - 5) the applicant family is Elderly (as defined in 24 CFR 5.403); and/or
  - 6) the applicant family has one or more dependents (as defined in 24 CFR 5.603).

Preference standards are listed in Appendix B.

Staff will inform all applicants of the availability of Selection Preferences and will give all applicants an opportunity to provide verification that they qualify for a Selection Preference. Staff will verify information provided by the applicant and will determine if the applicant

## **COQUILLE INDIAN HOUSING AUTHORITY**

### **ADMISSIONS & OCCUPANCY POLICY**

---

qualifies for a Selection Preference. Once a determination is made, staff will notify the applicant of the determination.

Staff may provide for circumstances in which applicants who do not qualify for a Selection Preference are admitted before applicants who are so qualified. Certain applicants may be selected for housing using these criteria:

- Attending college on a full-time basis
  - needing emergency housing
  - having other unique circumstances.
- B. An applicant will be offered no more than two homes. The applicant has the option of rejecting the first home and awaiting notification of the second available home. Should the applicant reject the second home, the applicant will be placed at the bottom of the waiting list and the date and time of rejection of the second available home will apply to their application. The applicant will not qualify for Selection Preferences when placed back on the bottom of the waiting list.
- C. Prior to admission, an applicant for a Mutual Help home must sign a letter of intent to enter into a Lease or a Mutual Help and Occupancy Agreement (MHOA), attend mandatory counseling sessions that describe their obligations and be willing and able to make the required Mutual Help contribution.

#### **SECTION 5: USE OF THE HOME**

- A. Tenants, Homebuyers and the housing authority are jointly responsible to the Tribe and future generations for ensuring that the homes are used properly and are well maintained.
- B. It is the responsibility of each resident to show respect for the housing program and appreciation for his low housing cost by keeping his unit and grounds in a decent, safe and sanitary condition at all times.
- C. When the need for maintenance arises from time to time, tenants are expected to inform the housing authority promptly and Homebuyers are expected to perform necessary maintenance in a timely manner.
- D. Instances of serious abuse or misuse of the home, or failure by the Homebuyer to provide basic routine or non-routine maintenance are causes for termination from the housing program.

# EMPIRE COMPREHENSIVE PLAN

## Coquille Indian Tribe



FINAL  
JULY 2018



# EXECUTIVE SUMMARY

Completing a Comprehensive Plan for the Coquille Indian Tribe's (CIT) Empire property is listed as one of the Tribe's priorities in the 2006-2010 CIT Strategic Plan. The Empire Comprehensive Plan designates land use zones that meet the needs of the Tribe and develops a transportation network that connects land uses to access roads outside of the properties and is supportive of people traveling on foot, by bicycle and on transit.

The CIT Empire property encompasses approximately 1,100 acres in Coos County, OR. In this Empire Plan, the North and South parcels are divided into six areas for planning purposes. As shown on page ii, the North Parcel is comprised of areas A and B where there is significant opportunity for development. The South Parcel includes areas C, D, E and F.

Area C is the Kilkich Community, which is mostly built out, though there are some opportunities to add dwelling units. Area D encompasses the Tarheel Lake Natural Area (TLNA). No development is planned for lands within the TLNA designation. Area D separates Area E into two sections, E-West and E-East. Both areas include land suitable for development. Steep slopes and the Tribe Cemetery limited the development potential of Area F. However, the northwest corner is adjacent to an existing residential community and is considered developable land.

A total of 282 acres of the Empire Parcels are identified as developable lands after removing environmental constraints. Proposed zone designations for the Empire Parcels are described in the table below and illustrated on page iii. A total of 179

**Table i. CIT Empire Parcels: Developable Acres**

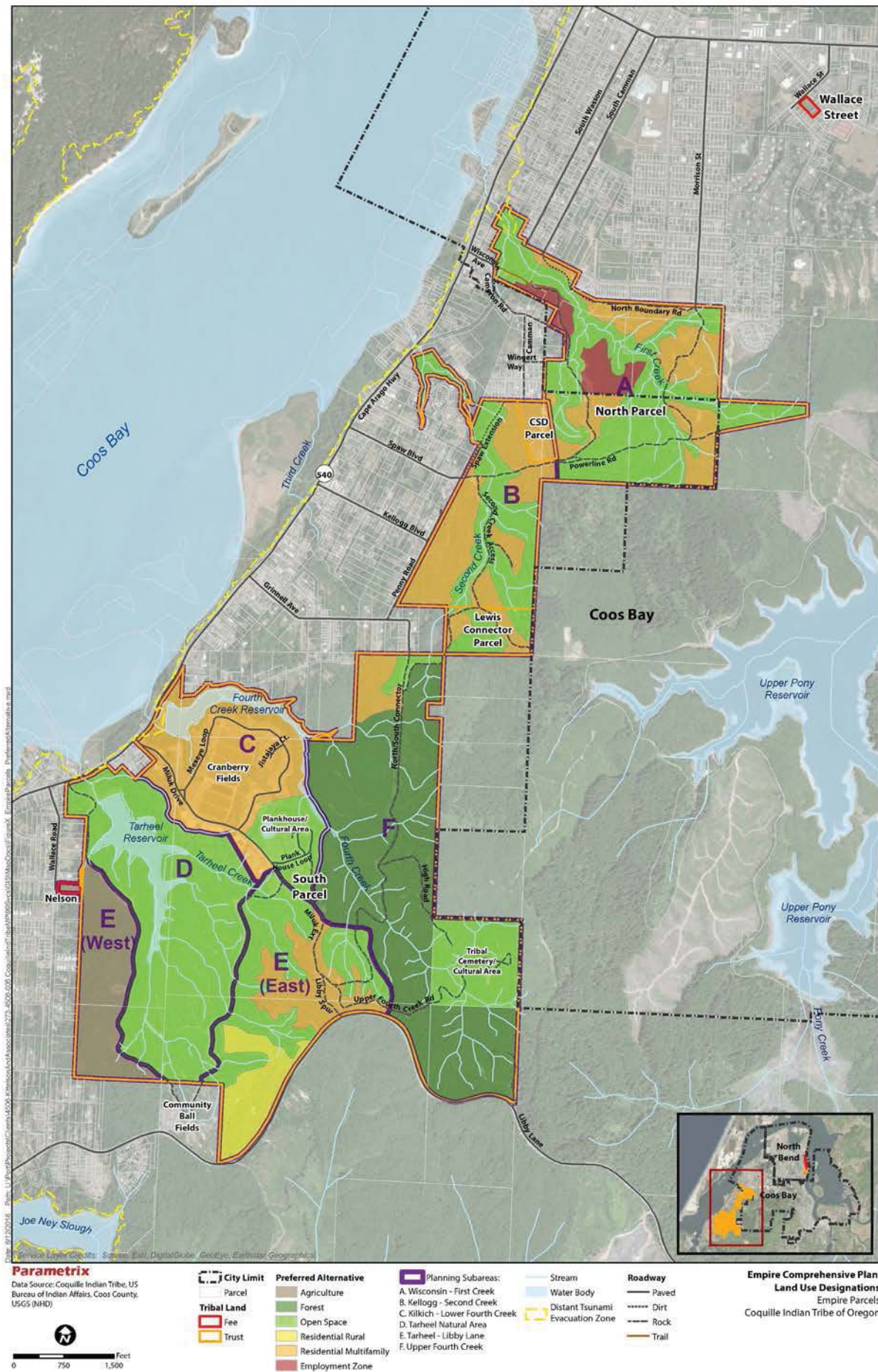
Developable Acres	A	B	C	D	E (East)	E (West)	F	Total
Employment	18							18
Residential Multifamily	59	72			35		13	178
Rural Residential					30			30
Agriculture						56		56
Total	77	72			65	56	13	282

buildable acres in portions of Area A, Area B, portions of Area E-East and Area F are zoned Residential Multifamily, which permits residential uses ranging from single family detached to apartments and condominiums. Area E-East also includes 30 developable acres with a new Residential Rural zone. Approximately 18 acres of land are dedicated to employment uses along on the eastern portion of Area A, south of First Creek, and another 56 acres in Area E-West are designated for Agriculture.

Access to development in the Empire North Parcel will be provided via Morrison Street and North Boundary Road. Additional areas for housing are located in the North Parcel east of Penny Road with anticipated access provided via extensions of Spaw Lane and Kellogg Lane. Residential development in the Empire South Parcel will be accessed primarily by Libby Spur via Libby Lane. Improving the Libby Spur to provide a connection from Libby Lane to Miluk Extension will create an opportunity for residential access and evacuation routing from the existing Killich residential area.



### Figure i. CIT Empire Zone Designations





# COQUILLE INDIAN HOUSING AUTHORITY



## LOW RENT MAINTENANCE POLICY

### PURPOSE

The purpose of unit maintenance is to preserve dwellings in decent, safe, and sanitary condition for current residents and to assure their long term viability. Residents and staff have a mutual responsibility to use and maintain the housing units and property in a manner that will allow them to be maintained at an economical cost, ensure they will be passed down in good condition, and reflect pride in the community.

Proper use by residents and systematic, quality maintenance by staff will keep the housing in good shape, extend its useful life, and result in lower overall costs.

The Executive Director is responsible for assuring that residents meet their use obligations and that staff meet their maintenance obligations.

### STANDARDS

The Executive Director will adopt use and maintenance guidelines that are consistent with industry standards and HUD Section 8 Housing Quality Standards. All maintenance services and preventive maintenance programs will be undertaken on a regularly scheduled basis.

### RESIDENT MAINTENANCE RESPONSIBILITIES

At a minimum, residents are responsible for:

- a. Keeping the inside and outside of the unit in decent, safe, and sanitary condition.
- b. Assuring that shower curtains are properly used to prevent water from spilling onto the floor.
- c. Assuring that only human wastes and toilet tissue enter the toilet.
- d. Removing or reporting safety hazards.
- e. Reporting all breakdowns as soon as they occur.
- f. Cleaning all grease from stove tops, element basins, and range hoods weekly.
- g. Cleaning sink drains with a commercial drain cleaner monthly.
- h. Replacing furnace filters monthly during the heating season.
- i. Frequent lawn care in season, picking up garbage and trash from their yards and common areas, and removing unused cars.
- j. Cleaning the unit upon move-out.

## **COQUILLE INDIAN HOUSING AUTHORITY**

### **LOW RENT MAINTENANCE POLICY**

---

#### **SPECIAL REQUESTS**

Unless prior written approval is obtained from the Executive Director, alterations, additions, or removal of any part of the permanent structure, whether interior or exterior, are prohibited, including interior painting. Requests for such changes shall be made in accordance with applicable CIHA policy. Additions or improvements to the unit will remain upon move-out. Unauthorized alterations may be removed or corrected at the resident's expense.

#### **CIHA MAINTENANCE RESPONSIBILITIES**

At a minimum, the CIHA maintenance program will include:

- a. An effective scheduling system for routine and preventive maintenance tasks.
- b. An effective work order system.
- c. Thorough annual physical inspections of each dwelling unit.
- d. A plan for rehabilitation of vacated units including outside contractor assistance when needed.
- e. A schedule of future major replacements and their estimated costs.
- f. Supervisory spot checks to assure the quality and quantity of work performed.
- g. Secure storage where sufficient materials, supplies, and tools will be kept on hand.
- h. Accurate records of repairs and replacements for each unit.

#### **ROUTINE MAINTENANCE AND MINOR REPAIRS**

Routine maintenance is that which is needed on a day to day basis to maintain buildings, grounds, and equipment in good working condition, including minor repairs, and may be performed by staff or contracted personnel.

#### **PREVENTIVE MAINTENANCE**

Preventive maintenance is the prescheduled and methodical checking and servicing of dwelling unit equipment and systems to extend an item's working life and minimize the need for more costly repairs at a future time. Among other things, this consists of:

- a. Checking, adjusting, cleaning, and lubricating heating equipment.
- b. Inspecting ranges, water heaters, space heaters, and refrigerators for proper performance and for needed replacement of worn or broken parts.
- c. Inspecting, servicing, and replacing worn equipment parts.

**COQUILLE INDIAN HOUSING AUTHORITY**  
**LOW RENT MAINTENANCE POLICY**

---

- d. Checking and repairing plumbing fixtures, toilet tanks, drains, condition of porcelain, etc.
- e. Inspecting for and eliminating termite and vermin infestation.
- f. Painting.
- g. Inspecting and caulking roofs, chimneys, gutters, down spouts, vents, and flashing.
- h. Inspecting underground facilities for corrosion and controlling corrosion.
- i. Inspecting for condensation, dampness, and dry rot in wood and taking appropriate corrective measures.
- j. Patching paved surfaces and sealcoating.
- k. Correcting erosion and drainage deficiencies.
- l. Fertilizing and cultivating planted areas.
- m. Installing protective barriers for planted areas and trees.
- n. Checking fire safety equipment for operability.
- o. Caulking around bathtubs, toilets, countertops, windows, and doors.

## **WORK ORDERS**

Work orders are written requests/instructions to repair breakdowns. They are usually requested by residents, sometimes by staff. Not all work orders are emergencies and most do not require immediate attention, but are usually items that need to be repaired within a reasonably short period of time to prevent further problems. The following are examples of common breakdowns:

- a. Stopped up or leaking toilet or sink.
- b. Stove burner, bake element, or broiler element not working.
- c. Broken window.
- d. Sheetrock damage.
- e. Leaking faucet.
- f. Leaking p-trap under sink.
- g. Burned out range fan.
- h. Broken door jamb or strike plate.

Resident requests and other breakdowns will be addressed using a work order system. Residents may submit maintenance requests to the Housing Authority office by phone or in person. The staff person receiving the request will enter it into the work order database, indicating the name

## COQUILLE INDIAN HOUSING AUTHORITY

### LOW RENT MAINTENANCE POLICY

---

of the resident, unit number, date received, and a brief but specific description of the work requested. Work orders shall be provided to the Maintenance Coordinator who will prioritize them along with other maintenance work. The Executive Director may assist with prioritization as necessary.

When repairs are completed, maintenance staff will enter information into the database for the work order, noting all additional information that may be relevant. Completed work orders will describe the nature of the repairs, material costs, labor costs, and responsibility for payment. If the resident is to be charged, their full costs shall be posted in their resident ledger account and billed. Maintenance costs charged to residents will include all materials and equipment costs, mileage, labor (including related benefits), and office overhead. Labor and overhead will be billed at the current hourly rate adopted by the CIHA Board of Commissioners posted at the CIHA office.

### INSPECTIONS

Move-In: Maintenance staff will inspect the unit with the new resident in attendance using the CIHA move-in inspection form and making notes regarding the condition of the unit. Resident will sign indicating agreement with the inspection report and accepting the condition of the unit subject to any repairs identified. A copy will be given to the resident. This inspection form will be kept in the resident's file.

Annual: Maintenance staff will inspect the unit annually at the time of recertification using a CIHA housing quality standards inspection form. Resident will be informed of inspection results in writing, including any work orders arising from the inspection and/or conditions requiring corrective action by the resident. Follow up inspections may be performed if necessary to ensure resident compliance with any required corrective action. Annual and follow-up inspection forms will be kept in the resident's file.

Notice of Intent to Vacate: Residents are required to notify the Housing Authority in writing of their intent to vacate their unit at least 30 days in advance of their move-out date. If staff time permits, a pre-move-out inspection may be performed with the resident using the move-in inspection report as a reference. The resident will be advised of any work for which they will be held responsible. Limited technical assistance may be provided at this time. Residents may have the option to repair, or have repaired, any damage or maintenance and clean up that they are responsible for if, and only if, they are qualified to do the work. Qualification to do the work will be determined by the Maintenance Coordinator and/or Executive Director. All work must be completed in a workmanlike manner. Staff will inspect all work performed and will determine if the work is of acceptable quality. When the move-out date arrives, the same inspector will conduct a move-out inspection and give the resident a copy of the final move-in/move-out inspection report and a written statement of work items for which the resident will be held financially responsible.

## **COQUILLE INDIAN HOUSING AUTHORITY**

### **LOW RENT MAINTENANCE POLICY**

---

Move-Out: Maintenance staff will inspect the unit with the resident, using the move-in inspection form, comparing move-out condition to move-in condition, and making notes of normal wear and tear and any repair or replacement items for which the resident may be held responsible. If significant damages are evident, photos and/or videos will be taken. Any items left by the resident that the Maintenance Coordinator deems to be of value shall be kept for a period not to exceed 45 days. Items unclaimed after 45 days will be disposed of at the discretion of the Maintenance Coordinator or Executive Director.

Any needed repair or rehabilitation work will begin as soon as possible after a vacancy occurs. Charges will be assessed to the vacating resident for any work required beyond normal wear and tear. The following list includes some, but not all, of the items generally considered to be the resident's financial responsibility:

- a. Repair or replacement of damaged sheetrock and painting.
- b. Repair or replacement of damaged trim and baseboards.
- c. Repair or replacement of damaged doors.
- d. Repair or replacement of damaged cupboards.
- e. Replacement of broken or cut floor tiles.
- f. Replacement of towel racks and grab bars.
- g. Replacement of broken light fixtures.
- h. Replacement of broken windows.
- i. Replacement of damaged blinds.
- j. Other damage-related repairs.
- k. Removal of garbage, trash, and belongings left behind.
- l. General clean-up.

If a move-out is unannounced, staff will inspect the unit as soon as the vacancy is known and appropriate repair costs will be charged to the resident. A record of the inspection, work orders, and charges will be kept. Collection efforts will be made, including use of a private collection agency and court action, if deemed appropriate. Residents who vacate owing debts to the Housing Authority will be unable to participate in HUD-assisted housing programs until all past due accounts have been paid or an acceptable pay back agreement has been reached.

### **PREPARATION FOR REOCCUPANCY**

## **COQUILLE INDIAN HOUSING AUTHORITY**

### **LOW RENT MAINTENANCE POLICY**

---

After a resident vacates a unit, maintenance staff will clean and repair any needed items in a unit in preparation for reoccupancy. Staff will utilize a preparation for reoccupancy checklist to assure that everything is in proper working order and condition prior to the unit being offered to a subsequent resident. After completion, data from preparation for reoccupancy checklists will be entered into the routine maintenance database and will be kept in the unit file at the Housing Authority office. During prep for reoccupancy, items requiring upgrade will be replaced and the serial numbers of appliances and other unit equipment will be verified against those on record for the unit.

#### **NON-ROUTINE (EXTRAORDINARY) MAINTENANCE & SCHEDULED REPLACEMENTS**

This type of maintenance consists of major repairs and rehabilitation involving substantial expenditures such as roof replacement, replacing aged appliances, etc. Non-routine maintenance will be scheduled and budgeted in advance of actual need whenever possible.

#### **EMERGENCY MAINTENANCE**

An emergency is any event that poses an immediate threat to safety or health, or might cause further damage to property if not corrected as soon as possible. Emergencies will receive immediate attention and repairs should be completed the same day, if possible. Among others, the following are considered to be emergency situations necessitating repair outside of normal working hours:

- a. Broken water pipes.
- b. No electricity in the unit.
- c. All stove burners not working.
- d. Refrigerator not working.
- e. Serious leaks in roof, walls, windows, etc.
- f. Toilets or sinks overflowing (plumbing backup).
- g. No heat in winter.
- h. Fires, accidents, natural disasters, vandalism, and break-ins.

Emergency calls will be received in the CIHA office during normal business hours. Calls for after-hours emergencies and those occurring on weekends or holidays shall be directed to the Maintenance Coordinator at the telephone number provided to residents for that purpose at orientation or by subsequent written notice.

CIHA reserves the right to enter units at any time without advance notice if there is reasonable cause to believe an emergency exists.

## **COQUILLE INDIAN HOUSING AUTHORITY**

### **LOW RENT MAINTENANCE POLICY**

---

#### **MAINTENANCE PRIORITIES**

- a. Emergency maintenance.
- b. Restoration of vacated units.
- c. Routine and preventive maintenance.
- d. Non-routine maintenance.

#### **NEW PROJECTS**

The Maintenance Coordinator will observe operating tests, learn pipe and valve locations and other details, and become familiar with the physical aspects of any new projects while the elements are still open to view and under the care of a contractor. Among other things, he/she shall:

- a. Obtain and file copies of up to date as-built drawings from contractors.
- b. Obtain and permanently file all manufacturer's instructions and service booklets for installed equipment.
- c. Perform warranty inspections no less frequently than every three months during the warranty period, immediately informing the Projects Coordinator of any deficiencies observed. The Projects Coordinator will contact the contractor for resolution of any issues.

It is the responsibility of the Maintenance Coordinator to be aware of the expiration dates of applicable warranties on any mechanical equipment and appliances, as well as the end of the warranty period for a project, so that eligible items can be corrected prior to expiration of the warranty period. These dates shall be scheduled into maintenance planning.

#### **RECORDS**

All as-built drawings, warranty documents, manufacturer's instructions, service booklets, work orders, painting records, replacement records, unit and equipment inspection records, purchase orders, invoices, and other relevant documents shall be retained in appropriate files to provide a permanent physical and financial history for each dwelling unit or building.

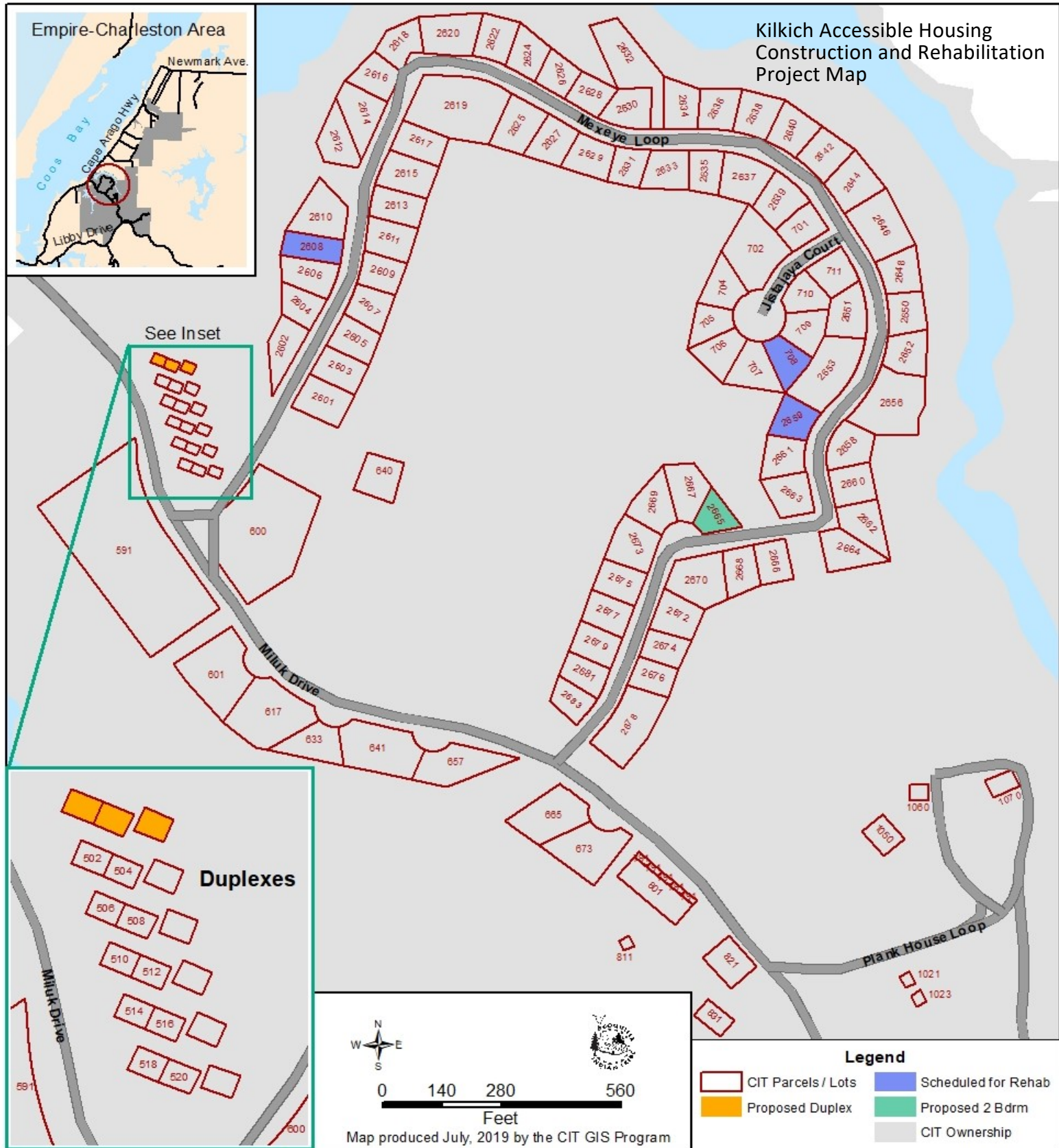
**Rating Factor 3**  
**Supporting Attachments**

**Rating Factor 3.2**

Map Showing Project Location	2
Excerpts from Procurement Policy: Indian Preference	3-7
Conceptual Designs	8-15

**Rating Factor 3.3**

Documentation of Site Control	16-18
Expanded Work Plan	19



## COQUILLE INDIAN HOUSING AUTHORITY

### PROCUREMENT POLICY

---

A business concern owned in substantial part by persons residing in the area of the project is defined as a business concern which is 51% or more owned by persons residing within the Section 3 covered project, considered by the U. S. Small Business Administration to be socially or economically disadvantaged, and meeting the definition of small business above.

#### **B. Tribal and Indian Preference Requirements**

- 1. General.** Projects developed and operated with assistance under NAHASDA are subject to Section 7(b) of the Indian Self-determination and Education Assistance Act (25 U. S. C. 450e(b)). Section 7(b) provides that to the greatest extent feasible, preference shall be given to Indian organizations and Indian-owned economic enterprises in the award of all contracts and subcontracts. However, NAHASDA and its applicable regulations also provide that “Notwithstanding any other provision of law, with respect to any grant (or portion of a grant) made on behalf of an Indian tribe under [NAHASDA] that is intended to benefit 1 Indian tribe, the tribal employment and contract preference laws (including regulations and tribal ordinances) adopted by the Indian tribe that receives the benefit shall apply with respect to the administration of the grant (or portion of a grant).” (25 U.S.C. 4111(k)). The Coquille Indian Tribe has adopted Tribal contract preference requirements in its Fiscal Management Ordinance, Coquille Tribal Code, §160.200(6)(c). Thus, the Tribal preference requirements must be applied first, and only if there is no Tribal contractor who meets those requirements would the Indian preference requirements apply. Preference must be provided in accordance with the methods set forth in NAHASDA and consistent with 2 C.F.R. Part 200. Where Tribal and Indian preference is determined not to be feasible, CIHA shall document the procurement file with the basis for its findings. Tribal and Indian preference applies not only on Coquille Tribal Lands or elsewhere within CIHA’s jurisdiction, but also to contracts with firms that operate outside these areas. Tribal and Indian preference in the solicitation, evaluation, and award process shall be as described above.
- 2. Eligibility.** Eligibility for Tribal preference shall be established in accordance with Coquille Tribal Code Section 160.200(6)(c). Eligibility for Indian preference shall be established in accordance with procedures consistent with NAHASDA. If CIHA or its prime contractor determines an applicant ineligible for Tribal or for Indian preference, CIHA or the prime contractor shall notify the applicant in writing before contract award, or filling the position, or providing the desired training.
- 3. Contract Clauses and Solicitation Notices.**
  - a. Solicitations shall include the following information:
    - i. A statement of the applicability of Tribal and Indian preference to the solicitation and a time before the due date for offers by which offerors must submit evidence of eligibility for Tribal or Indian preference;

**COQUILLE INDIAN HOUSING AUTHORITY**  
**PROCUREMENT POLICY**

---

- ii. Any applicable locally imposed preference requirements properly enacted by the tribal governing body and adopted by CIHA (or advise offeror to contact the tribal governing body to determine any applicable preference requirements);
- iii. Information as to whether CIHA maintains lists of Tribal- or Indian-owned economic enterprises and Tribal or Indian organizations by trade specialty which are available to contractors and subcontractors for use in meeting Tribal and Indian preference responsibilities;
- iv. A requirement that offerors provide a statement describing how they will provide Tribal and Indian preference in subcontracting, training and employment, including the number or percentage of Tribal members and Indians to be employed and trained;
- v. CIHA's description of the information to be submitted on Tribal and Indian preference;
- vi. The factors that CIHA will use in judging the adequacy of the Tribal or Indian preference information submitted;
- vii. A statement that failure to submit the required Tribal and Indian preference statements on subcontracting, training, and employment shall be grounds for rejection of the offer;
- viii. A requirement that each contractor and subcontractor submit a certification and supporting evidence to CIHA whenever it is not feasible to provide Tribal or Indian preference in subcontracting;
- ix. For requests for proposals that are not restricted to Tribal member-owned or Indian-owned economic enterprises or organizations, the percentage or number of points set aside for Tribal or Indian preference and the method for allocating these points;
- x. For requests for proposals that are not restricted to Tribal member-owned or Indian-owned economic enterprises or organizations, a requirement that contractors using a request for proposals to solicit subcontractors reserve 15% of the available rating points for Tribal and for Indian preference in subcontracting and the criteria to be used in evaluating subcontractor proposals, with the award to go to the Tribal member-owned economic enterprise or organization over the Indian-owned entity if the points are otherwise the same; and,
- xi. A requirement that offerors submit a list of core crew employees with their offers and that contractors and subcontractors are required to provide

## COQUILLE INDIAN HOUSING AUTHORITY

### PROCUREMENT POLICY

---

preference to the greatest extent feasible by hiring qualified Tribal members and other Indians in all positions other than core crew positions.

- b. Solicitations, contracts, and subcontracts shall include the following:
    - i. A reference to the applicability of Tribal preference requirements consistent with this policy and Coquille Tribal Code §160.200(6)(c);
    - ii. The clause implementing Section 7(b) of the Indian Self-Determination and Education Assistance Act in connection with the development or operation of CIHA projects in accordance with 24 C.F.R. § 1000.52 as this provision currently exists or is subsequently amended;
    - iii. The grounds for termination of a contract or the imposition of penalties for improper subcontracting or false certification as to subcontracting with Tribal member-owned or Indian-owned economic enterprises or organizations; and,
    - iv. Any additional information required because of the nature of the project.
  - c. If all required clauses and provisions are not included on form documents (e.g. HUD-5369 and HUD-5370), then CIHA shall attach any additional clauses or provisions to the forms used in solicitations and contract documents.
- 4. Monitoring and Remedies.** CIHA shall monitor the implementation of Tribal and Indian preference in its contracts, subcontracts, training, and employment, and take appropriate remedial action (including cancellation of contracts and assessments of penalties) to ensure compliance.

## VI. ETHICS IN PUBLIC CONTRACTING

### A. General

CIHA shall adhere to the following code of conduct and shall comply with the limitations imposed by NAHASDA and other applicable law, consistent with 2 C.F.R Part 200.

### B. Conflict of Interest

The Coquille Indian Housing Authority prohibits its officers, employees, and agents from participating directly or indirectly in the selection or in the award or administration of any contract if a conflict, real or apparent, would be involved. Such conflict would arise when a financial or other interest in a firm selected for award is held by:

- 1. An officer, employee, or agent involved in making the award;
- 2. His/her relative, including father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law,

## COQUILLE INDIAN HOUSING AUTHORITY

### PROCUREMENT POLICY

---

daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, and half-sister;

3. His/her partner; or,
4. An organization which employs, is negotiating to employ, or has an arrangement concerning prospective employment of any of the above.

#### **C. Gratuities, Kickbacks, and Use of Confidential Information**

CIHA officers, employees, or agents shall not solicit or accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties of subcontracts, and shall not knowingly use confidential information for actual or anticipated personal gain.

#### **D. Prohibition against Contingent Fees**

Contractors shall not retain a person to solicit or secure a CIHA contract for a commission, percentage, brokerage, or contingent fee, except for bona fide employees.

#### **E. Consequences for Violating Code of Conduct**

Employees, officers, and agents of CIHA who engage in the award and administration of contracts shall abide by the provisions of this Section, which establishes a code of conduct for carrying out procurement activities.

1. **Disciplinary Action Against Employee Violating Code of Conduct.** Any employee of CIHA who violates any provision of this code of conduct will be subject to disciplinary action, up to and including termination from employment, depending on the severity of the violation.
2. **Disciplinary Action Against Officer or Agent Violating Code of Conduct.** Any officer or agent of CIHA who violates any provision of this code of conduct will be subject to disciplinary action, up to and including removal from office or termination of contractual or other relationship, depending on the severity of the violation.
3. **Civil Action to Recover Any Improper Financial Benefit from Employee, Officer, or Agent Violating Code of Conduct.** CIHA may seek repayment from an employee, officer, or agent of the Housing Authority of any improper financial benefit that the employee, officer, or agent gained for him- or herself or for another person through such violation, which may include filing suit against the employee, officer, or agent in a court of competent jurisdiction for such repayment. Where the matter involves an employee or former employee, such action may be taken in addition to or in lieu of disciplinary action against the employee.

# COQUILLE INDIAN HOUSING AUTHORITY

## PROCUREMENT POLICY

---

### APPENDIX A: TRIBAL AND INDIAN PREFERENCE

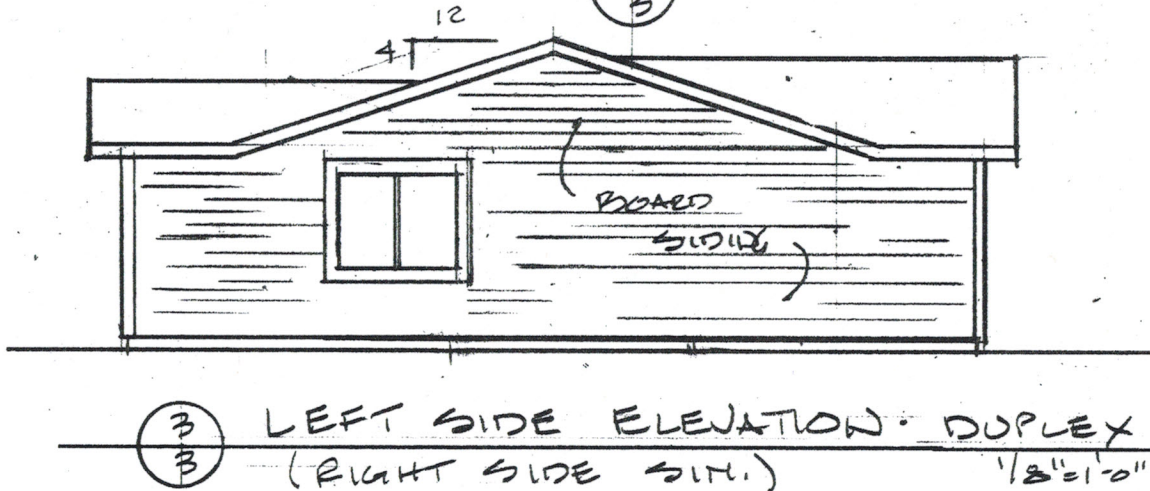
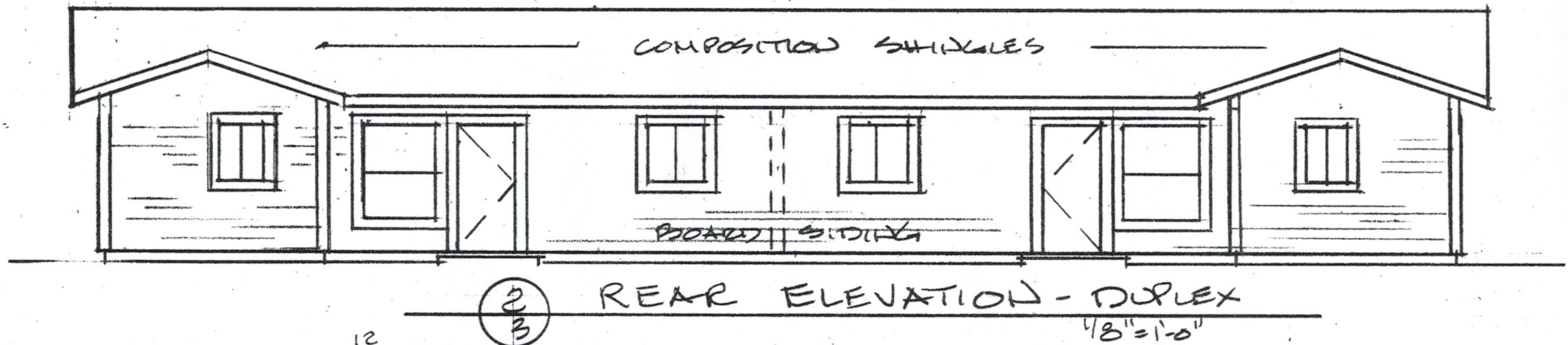
In accordance with this statement, awards shall be made under **unrestricted sealed bid** solicitations to the lowest responsive bid from a qualified **Tribal member-owned** economic enterprise or organization within the maximum total contract price established for the specific project or activity being solicited, if the bid is no more than “X” higher than the total bid price of the lowest responsive bid from any qualified bidder. The factor “X” is determined as follows:

<u>When the lowest responsive and responsible bid is:</u>	<u>X = the lessor of:</u>
Less than \$100,000	10% of that bid or \$9,000
At least \$100,000 but less than \$200,000	9% of that bid or \$16,000
At least \$200,000 but less than \$300,000	8% of that bid or \$21,000
At least \$300,000 but less than \$400,000	7% of that bid or \$24,000
At least \$400,000 but less than \$500,000	6% of that bid or \$25,000
At least \$500,000 but less than \$1 million	5% of that bid or \$40,000
At least \$1 million but less than \$2 million	4% of that bid or \$60,000
At least \$2 million but less than \$4 million	3% of that bid or \$80,000
At least \$4 million but less than \$7 million	2% of that bid or \$105,000
\$7 million or more	1% of the lowest responsive bid with no dollar limit

In accordance with this statement, awards shall be made under **unrestricted sealed bid** solicitations to the lowest responsive bid from a qualified **Indian -owned** economic enterprise or organization within the maximum total contract price established for the specific project or activity being solicited, if the bid is no more than “X” higher than the total bid price of the lowest responsive bid from any qualified bidder. The factor “X” is determined as follows:

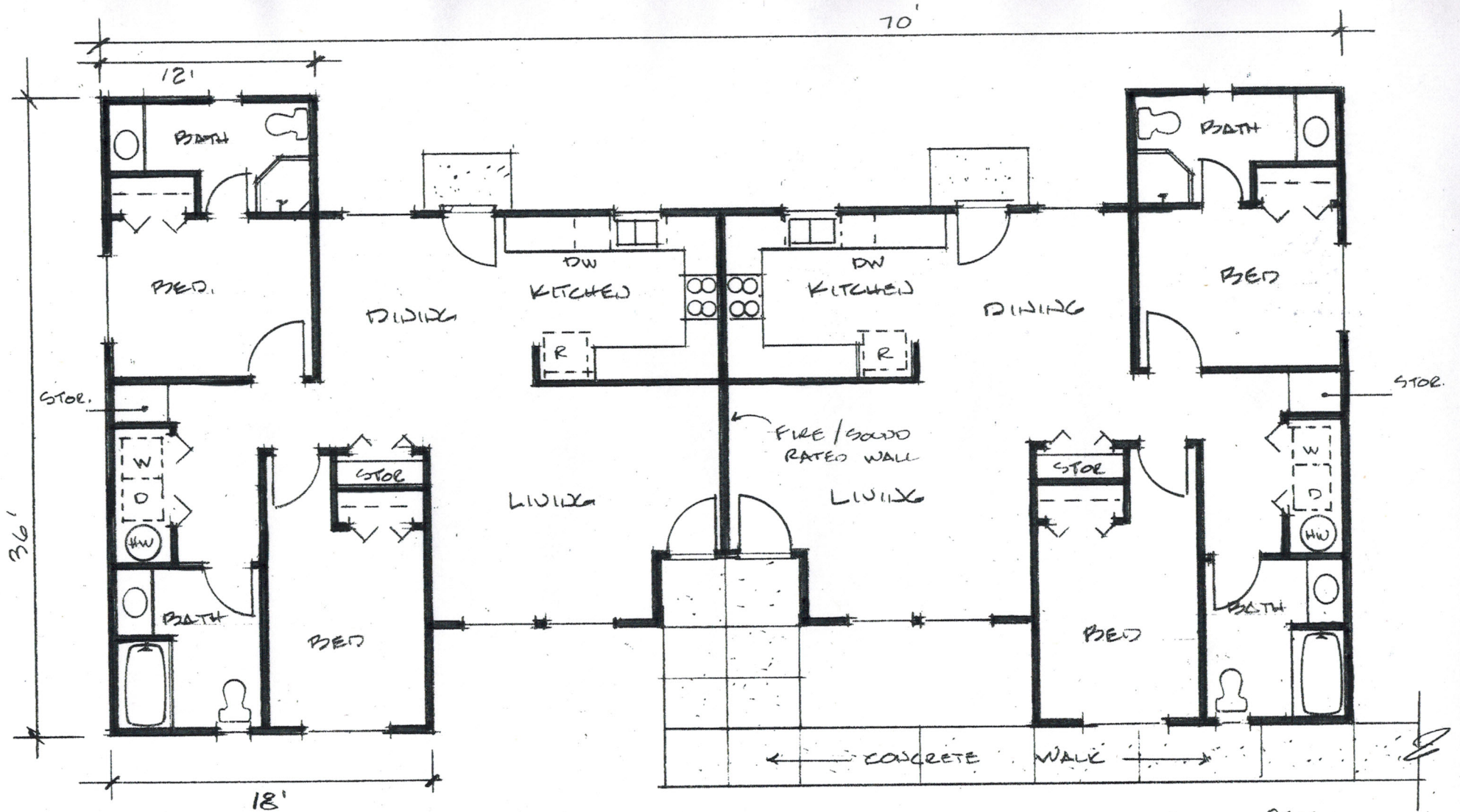
<u>When the lowest responsive and responsible bid is:</u>	<u>X = the lessor of:</u>
Less than \$100,000	5% of that bid or \$4,500
At least \$100,000 but less than \$200,000	4.5% of that bid or \$8,000
At least \$200,000 but less than \$300,000	4% of that bid or \$10,500
At least \$300,000 but less than \$400,000	3.5% of that bid or \$12,000
At least \$400,000 but less than \$500,000	3% of that bid or \$12,500
At least \$500,000 but less than \$1 million	2.5% of that bid or \$20,000
At least \$1 million but less than \$2 million	2% of that bid or \$30,000
At least \$2 million but less than \$4 million	1.5% of that bid or \$40,000
At least \$4 million but less than \$7 million	1% of that bid or \$52,500
\$7 million or more	.5% of the lowest responsive bid with no dollar limit

New Construction - Duplex, 2-Bedroom, 2-Bath



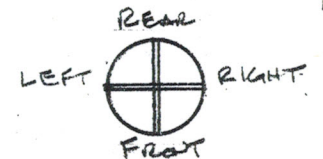
Kilkich Accessible Housing Construction  
& Rehabilitation Project  
Coquille Tribal Lands - Coos Bay, Oregon  
Project No. 1916 July, 2019

**RPT** RICHARD P. TURI  
ARCHITECTURE  
& PLANNING  
P.O. BOX 1107  
NORTH BEND, OREGON 97458



①  
②

FLOOR PLAN - DUPLEX UNIT  
1980 S.F.

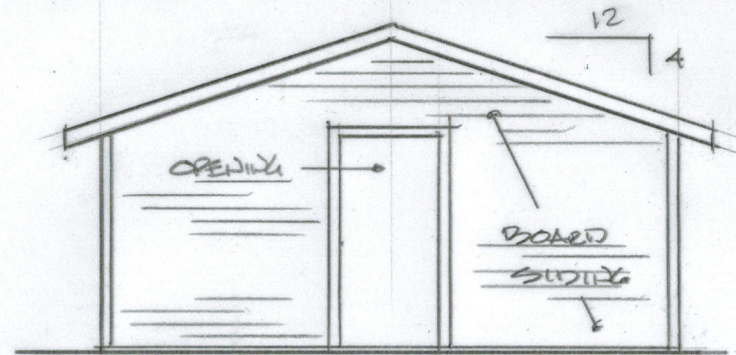


Kilkich Accessible Housing Construction  
& Rehabilitation Project  
Coquille Tribal Lands - Coos Bay, Oregon  
Project No. 1916 July, 2019

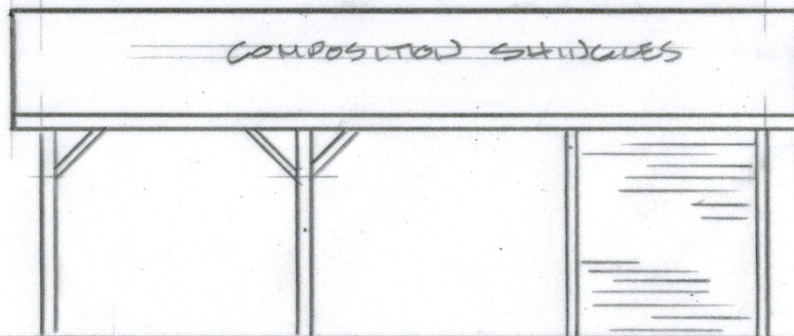
**RPT** RICHARD P. TURI  
ARCHITECTURE  
& PLANNING  
P.O. BOX 1107  
NORTH BEND, OREGON 97459



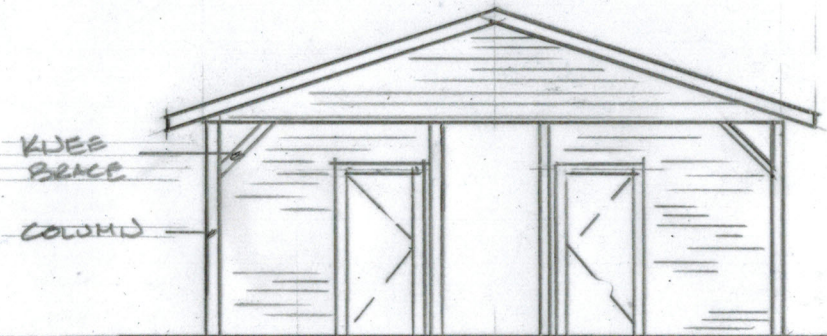
① FRONT ELEVATION  
④ DUPLEX CARPORT



② LEFT SIDE ELEVATION  
④ DUPLEX CARPORT



③ REAR ELEVATION  
④ DUPLEX CARPORT

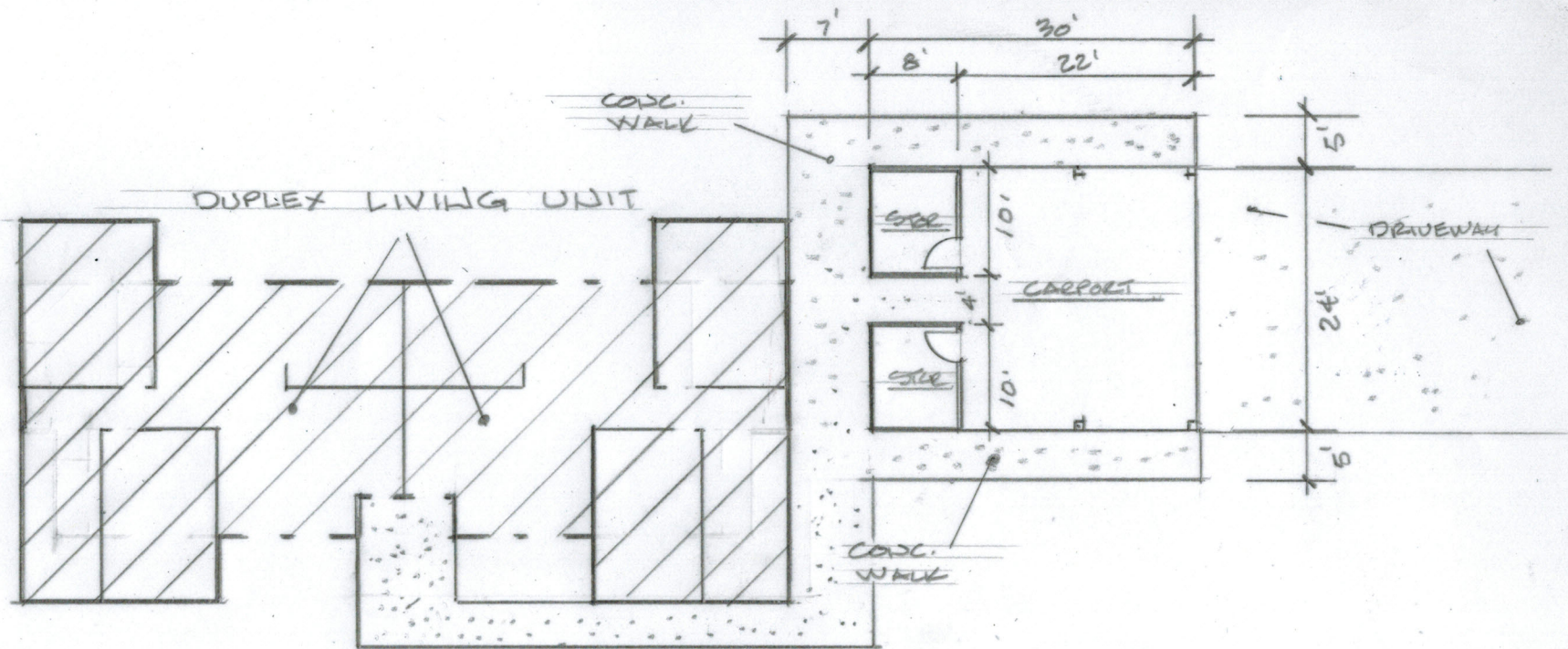



④ RIGHT SIDE ELEVATION  
④ DUPLEX CARPORT

Killich Accessible Housing Construction  
& Rehabilitation Project  
Coquille Tribal Lands - Coos Bay, Oregon  
Project No. 1916 July, 2019

**RPT** RICHARD P. TURI  
ARCHITECTURE  
& PLANNING  
P.O. BOX 1107  
NORTH BEND, OREGON 97459

SHEET NO. 4 OF 4




**OVERALL PLAN - DUPLEX / CARPORT**  
 1/16" = 1'0"

Kilkich Accessible Housing Construction  
 & Rehabilitation Project  
 Coquille Tribal Lands - Coos Bay, Oregon  
 Project No. 1916      July, 2019

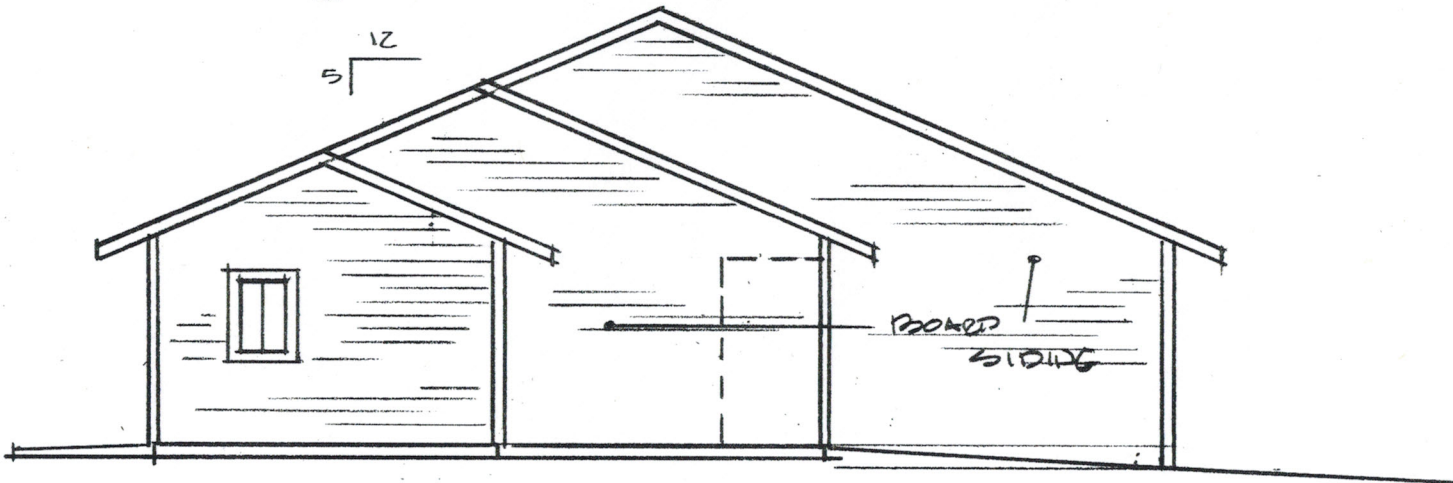
**RPT** RICHARD P. TURI  
 ARCHITECTURE  
 & PLANNING  
 P.O. BOX 1107  
 NORTH BEND, OREGON 97459

SHEET NO. 1 of 4

New Construction - Single Family, 2-Bedroom, 2-Bath



1  
2 FRONT ELEVATION - 2 BED.  
1/8" = 1'-0"

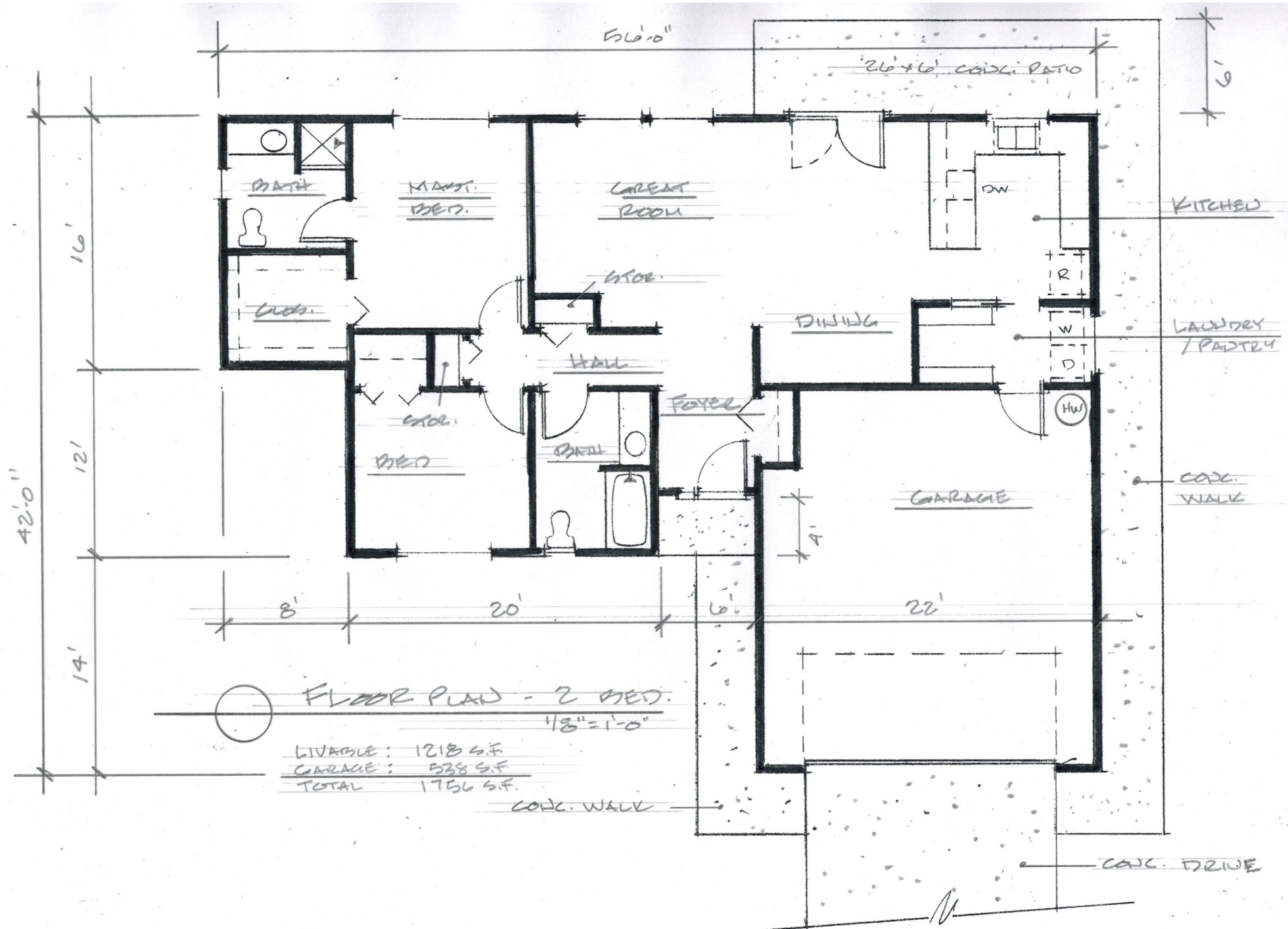


2  
2 LEFT SIDE ELEVATION - 2 BED.  
1/8" = 1'-0"

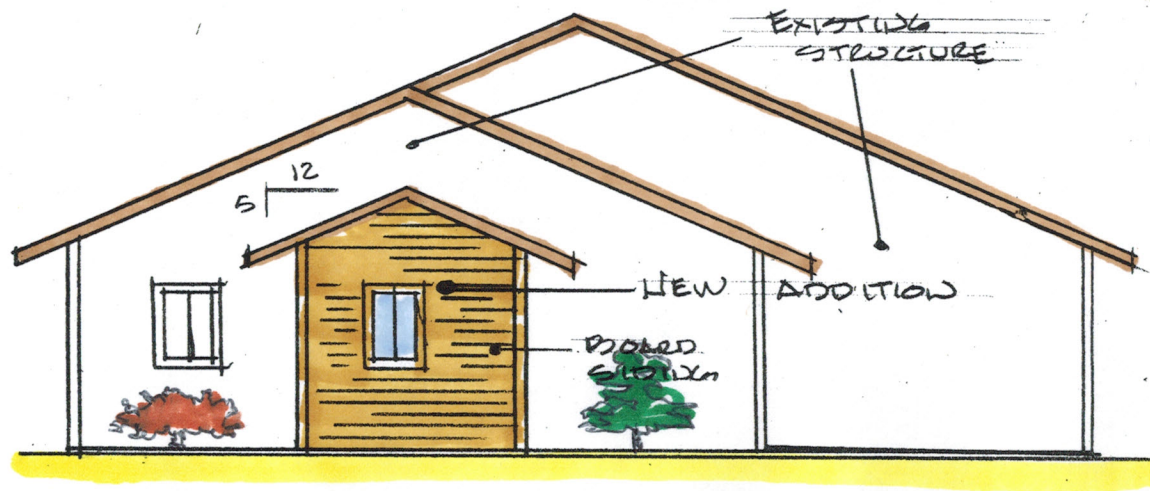
Kilkich Accessible Housing Construction  
& Rehabilitation Project  
Coquille Tribal Lands - Coos Bay, Oregon  
Project No. 1916 July, 2019

**RPT** RICHARD P. TURI  
ARCHITECTURE  
& PLANNING  
P.O. BOX 1107  
NORTH BEND, OREGON 97458

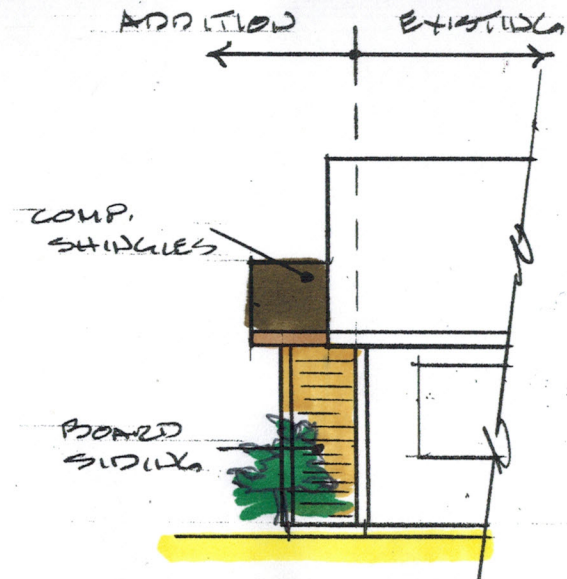
SHEET NO. 2 OF 3



Rehabilitation - Single Family, 3-Bedroom, 2-Bath



LEFT SIDE ELEVATION  
EX. 3 BED UNIT  
1/8" = 1'-0"

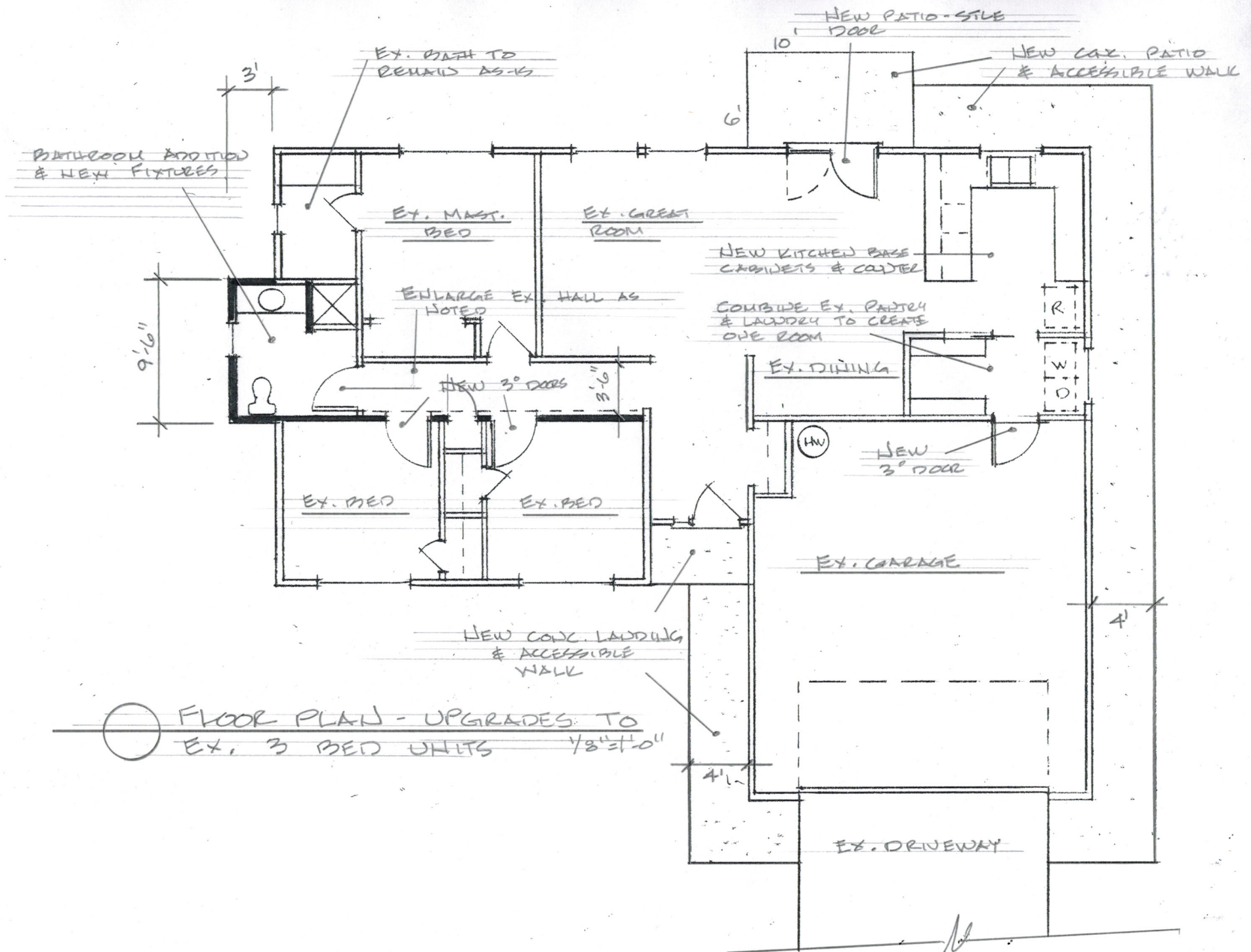


PARTIAL FRONT ELEVATION  
EX. 3 BED UNIT  
(REAR ELEVATION SIM.)

Kilkich Accessible Housing Construction  
& Rehabilitation Project  
Coquille Tribal Lands - Coos Bay, Oregon  
Project No. 1916 July, 2019

**RPT** RICHARD P. TURI  
ARCHITECTURE  
& PLANNING  
P.O. BOX 1107  
NORTH BEND, OREGON 97459

SHEET NO. 2 OF 2



93 06 0005

LONE ROCK TIMBER CO., Grantor  
COQUILLE INDIAN TRIBE, Grantee

After Recording Return to:

Lone Rock Timber Co.  
P.O. Box 1127  
Roseburg, Oregon 97470  
Atten: Rick Sohn

Until a change is requested,  
all tax statements shall be sent  
to the following address:

Coquille Indian Tribe  
c/o Coquille Economic Development Corporation  
4630 200th Street SW  
Suite N  
Lynwood, Washington 98036-6608

RECORDING # 93060005  
I, Mary Ann Wilson,  
Coos County Clerk, certify  
the within instrument  
was filed for record at



11:45 AM ON 06/01/1993  
M. WILSON

By \_\_\_\_\_ Deputy  
# pages 17 Fee \$113.00

### WARRANTY DEED - STATUTORY FORM

LONE ROCK TIMBER CO., an Oregon corporation, Grantor, conveys and warrants to COQUILLE INDIAN TRIBE, an indian tribe chartered under federal law (Coquille Indian Restoration Act of 1989, 103 Stat. 91), Grantee, the real property located in Coos County, Oregon, and legally described on Exhibit A, attached hereto and by reference incorporated herein.

GRANTOR HEREBY RESERVES all right, title and interest in and to the timber on the property as shown in the map attached hereto as Exhibit B. This right includes, but is not limited to the right to remove and sell all merchantable timber (defined as timber over twenty-five (25) years of age) on said property within the next three (3) year period. The right to remove the timber shall also include the right of access to the timber with the right to build and construct roads, which access and road rights shall automatically expire when the timber is removed. After all of the timber is removed, all rights reserved herein by the Grantor shall cease.

The said property is free from all encumbrances except recorded reservations, mineral rights and easements as shown in attached Exhibit C.

Page 1 - WARRANTY DEED - STATUTORY FORM

May 18, 1993 - 23598-81001\MCODEED.672

62-597  
AFTER RECORDING  
RETURN TO  
Titor Title Insurance  
131 N 3rd - Box 1075  
Coos Bay, OR 97420-0233

5

This deed is given upon the additional consideration that the COQUILLE INDIAN TRIBE, Grantee, consents to be sued in either United States Federal or Oregon State Courts by Grantor in the exercise of its timber rights as reserved herein.

The true consideration for this conveyance consists in whole of other value given.

THIS INSTRUMENT WILL NOT ALLOW USE OF THE PROPERTY DESCRIBED IN THIS INSTRUMENT IN VIOLATION OF APPLICABLE LAND USE LAWS AND REGULATIONS. BEFORE SIGNING OR ACCEPTING THIS INSTRUMENT, THE PERSON ACQUIRING FEE TITLE TO THE PROPERTY SHOULD CHECK WITH THE APPROPRIATE CITY OR COUNTY PLANNING DEPARTMENT TO VERIFY APPROVED USES.

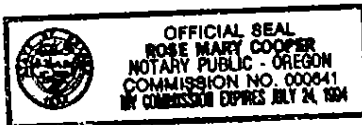
LONE ROCK TIMBER CO.

By: Howard F. Sohn  
President

By: Clare Eaton  
Assistant Secretary

STATE OF OREGON )  
County of Coos ) ss.

Personally appeared Howard F. Sohn and Clare Eaton, who, each being first duly sworn, did say that the former is the assistant secretary of LONE ROCK TIMBER CO., an Oregon corporation.



Rose Mary Cooper  
Notary Public for Oregon  
My commission expires: 7-24-94

93 06 0005

ACCEPTANCE

The Coquille Indian Tribe hereby accepts the foregoing Deed and specifically the provision whereby it consents to be sued in either the United States Federal or Oregon State Courts.

COQUILLE INDIAN TRIBE

By:

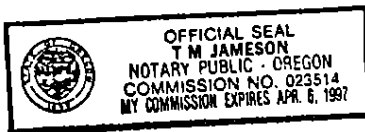
Edward L. Metcalf  
Title: Chairman

STATE OF OREGON

County of Coos

) ss.  
)

Personally appeared EDWARD L. METCALF, who is the CHAIRMAN of the Coquille Indian Tribe.



T M Jameson  
Notary Public for Oregon

My commission expires: Apr. 6, 1997

Page 3 -

WARRANTY DEED - STATUTORY FORM  
May 18, 1993 - 23598-81001WCODEED.672

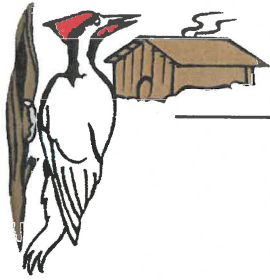
Coquille Indian Housing Authority  
Kilich Accessible Housing Construction and Rehabilitation Project  
Preliminary Implementation Plan

[illegible]

**Rating Factor 4**  
**Supporting Attachments**

Resolution Committing Leveraged Funds

2-3



# Coquille Indian Housing Authority

---

2678 Mexeye Loop • Coos Bay, OR 97420

## RESOLUTION HA1902

### AFFIRMING LEVERAGED RESOURCES FOR INDIAN HOUSING BLOCK GRANT (IHBG) COMPETITIVE GRANT

**WHEREAS**, the Coquille Indian Tribe (“Tribe”) is a federally recognized Indian Tribe pursuant to the Coquille Indian Restoration Act of June 28, 1989, 25 U.S.C. § 715, et seq.; and,

**WHEREAS**, by and through its Tribal Council, the Tribe has adopted a Housing Ordinance at CITC Chapter 130, which created the Coquille Indian Housing Authority (“CIHA”) and established a Board of Commissioners to manage the affairs of the Authority; and,

**WHEREAS**, CIHA’s role is to provide safe and affordable housing for low income families; and,

**WHEREAS**, CIHA prepared an Indian Housing Plan for the Fiscal Year ending September 30, 2020 which identified existing housing needs including overcrowded households, substandard units needing rehabilitation, households needing affordable rental units, disabled households needing accessibility, and units needing energy efficiency upgrades; and,

**WHEREAS**, CIHA’s Indian Housing Plan for FY 2020 adopted specific programs to address the stated needs including Program 2001.1 which will rehabilitate and provide accessibility modifications to three existing housing units and Program 2004.1 which will construct three new affordable and accessible housing units; and,

**WHEREAS**, CIHA’s Board of Commissioners is empowered, under Chapter 130 of the Coquille Indian Tribal Code, first adopted May 12, 1992, as the governing body of CIHA, to authorize construction of dwellings, buildings, and other facilities to support the affordable housing and related activities of CIHA; and,

**WHEREAS**, CIHA wishes to proceed with its planned construction of three new housing units and the rehabilitation of three existing housing units; and,

**WHEREAS**, the U.S. Department of Housing and Urban Development’s Indian Housing Block Grant (IHBG) – Competitive Grants program provides funding for construction and rehabilitation of affordable housing units serving American Indian and Alaska Native populations; and,

**WHEREAS**, the Coquille Indian Tribe's Tribal Council has provided a Tribal Resolution authorizing CIHA to be the sole applicant for IHBG – Competitive Grants program funding for the FY 2018-2019 funding round; and,

**WHEREAS**, the IHBG – Competitive Grants program requires affirmation of any funds that will be leveraged by their awarding of grant funding; and,

**WHEREAS**, CIHA's Indian Housing Plan for FY 2020 identifies \$25,000 of IHBG funds and \$400,000 of non-program funds that have been allocated to support Program 2001.1 and Program 2004.1; and,

**WHEREAS**, the approved revenues for these two programs reflect \$425,000 of funding that will be leveraged if CIHA's IHBG – Competitive Grants program application is approved; now,

**THEREFORE BE IT RESOLVED**, that the Board of Commissioners authorizes the submission of the IHBG – Competitive Grants application; and,


**BE IT FURTHER RESOLVED**, that the \$425,000 of funding included in CIHA's Indian Housing Plan for FY 2020 reflects committed funding that will be leveraged by the awarding of an IHBG – Competitive Grant; and,

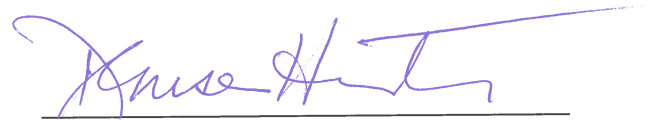
**BE IT FINALLY RESOLVED**, that the Chair of the CIHA Board of Commissioners and/or the CIHA Executive Director are hereby authorized and directed to prepare and execute all documents necessary to give this resolution full force and effect.

#### CERTIFICATION

The foregoing Resolution was duly adopted at the Coquille Indian Housing Authority Board of Commissioners meeting held on Coquille Tribal Lands in Coos Bay, Oregon on August 1, 2019 with the required quorum present by a vote of:

  4   For                        0   Against                        3   Absent                        0   Abstaining

  
\_\_\_\_\_  
Toni Ann Brend,  
Chair

  
\_\_\_\_\_  
Denise L. Hunter,  
Secretary/Treasurer

## **Rating Factor 5**

### **Supporting Attachments**

#### **Rating Factor 5.1**

Agenda and Minutes from Recent KRA Meeting	2-4
Interview Questions Used for Comprehensive Plan	5
Roster of Steering Committee for Comp Plan	6-7

# Kilkich Residents Association Board of Directors



Chair Duke Summers  
Vice Chair Laura Beth Barton  
Interim Secretary Pam Lenox  
Treasurer Carol Arzt  
Board Members at Large:  
Quila Doyle, Cindy Elbert,  
Janet Simpson, and Jennifer Trosper

## KRA Board of Directors Regular Monthly Meeting June 12, 2017

### AGENDA

1. Call to Order - Chair Duke Summers
2. Roll Call of Board Members and Introduction of Residents and Guests
3. Reading and Approval of Minutes from the May 8, 2017
4. Amendments to Agenda
5. Treasurer's Report - Treasurer Carol Arzt
  - ✚ KRA's financial status remains at \$685.25
6. Committee Reports
7. Old Business
  - ✚ Restoration Raffle preparation for Medford
  - ✚ New Fundraising opportunities – BINGO possibilities?
8. New Business
  - ✚ Coquille Indian Tribe Comprehensive Plan Interview Questions
  - ✚ KRA email response
9. Public Comment
10. Set Next KRA Board Meeting Date
11. Adjournment

Kilkich Residents Association  
Regular Meeting of the Board of Directors  
June 12, 2017

Call to Order

- Chair Duke Summers called the meeting to order at 5:40 p.m.

Roll Call

- Board members in attendance were Laura Beth Barton, Quila Doyle, Janet Simpson, Duke Summers, and Jennifer Trosper. Pam Lenox arrived after roll was called. Absent were Carol Artz and Cindy Elbert. CIHA staff in attendance was Dale Herring. Guests present were Matt Jensen, newly hired Tribal Planner, and Todd Tripp.

Approval of Minutes

- The minutes for the May 8, 2017 meeting were approved with changes. Last 2 bullet points were duplicated in New Business so it was moved and passed to remove the duplicates in Old Business but keep them in New Business.

Amendments to Agenda

- None

Treasurers Report

- The current financial status as of January 9, 2017 is \$685.25.

Committee Reports

- None

Old Business

- Restoration Silent Auction – Raffle. The celebration will be held in Medford this year. A table will be manned by Pam Lenox on Saturday for a 50/50 and a Blanket Raffle. Janet Simpson has agreed to assist at the table. Duke Summers will attend but will be working at other duties.
- KRA presence at Community Family nights will be discussed next month. Pam Lenox will check with Becky at the Community Center regarding future family nights.

New Business

- CIT Comprehensive Plan Interview Questions were discussed via teleconference with Steve Faust, a representative of Cogen, Owens, and Green. Main areas of discussion were the Reservation's assets and needs. Assets mentioned were open space, low crime, wooded lots, trails, playgrounds, and the proximity of the Health and Community Centers. Reservation needs mentioned were improved maintenance of trails and open

spaces, better communication of information regarding Tribal lands, access to additional exits for emergency, additional RV parking and possible storage for residents, housing opportunities are needed for Tribal members that do not qualify for HUD housing, either due to income or other forms of disqualification. It was also mentioned that it would be ideal for the Tribe have a portion of the cranberry bog made into a fish hatchery, allowing the Tribe to fish for its own salmon if State regulations were amended.

- As a result of discussion, it was agreed that Duke will obtain the use of a Tribal bus to drive KRA Board members on a tour of the northern parcel of the Tribe's Empire holdings at the next KRA meeting.

#### Public Comment

- None

#### Next Meeting Date

- The next KRA Board meeting was scheduled for Monday, July 10th, 2017 at 5:30 p.m.

#### Adjournment

- Chair Duke Summers adjourned the meeting at 6:45 p.m.

# Coquille Indian Tribe Comprehensive Plan

---

## CIT Stakeholder Interview Questions

March 22, 2017

### Introduction

The Coquille Tribal Council has made the completion of a Comprehensive Plan for Coquille Indian Tribe (CIT) properties a priority and included it in the most recent Tribal Strategic Plan. The Comprehensive Plan will focus on multimodal transportation, planning, and redevelopment opportunities for properties in Trust or in Fee. The Comprehensive Plan will guide and inform transportation infrastructure development and land use designations.

### General questions

- What are the current strengths of CIT properties from a land use and transportation perspective? For the North Bend site? For the Empire site?
- What is your vision for the future of CIT properties (North Bend; Empire)?
- What are some of the challenges or barriers for CIT properties (North Bend; Empire)? In your opinion, what are some of the ways those challenges could be addressed?

### What are the Tribe's most important assets?

- Natural and cultural resources?
- Economic development assets?
- Open space and recreation assets?

### What are the Tribe's most important needs related to:

- Natural and cultural resources?
- Economic development?
- Housing?
- Open space and recreation?
- Transportation?
- Public facilities (water, sewer, stormwater)?

### How should those needs be addressed? What future improvements are needed?

- Natural and cultural resources
- Economic development
- Housing
- Open space and recreation
- Transportation
  - To reduce the need for vehicle trips
  - To maximize the efficiency of public transportation
  - To offer increased multimodal transportation options (walk, bike, drive)
- Public facilities (water, sewer, stormwater)?

# EMPIRE COMPREHENSIVE PLAN

## Coquille Indian Tribe



FINAL  
JULY 2018



# ACKNOWLEDGEMENTS

## TRIBAL COUNCIL

Brenda Meade, Chairperson  
Kippy Robbins, Vice Chair  
Donald Ivy, Chief  
Linda Mecum, Secretary-Treasurer  
Toni Ann Brend – Representative No. 1  
Don Garrett – Representative No. 2  
Eric Metcalf, Representative No. 3

## COMPREHENSIVE PLAN WORK TEAM

Loretta Kuehn, CEDCO  
Kassie Rippee, CIT  
Robin Harkins, CIT  
Lyman Meade, CIHA  
Anne Cook, CIHA  
Mark Healey, CIT  
Darin Jarnaghan, CIT  
Scott Perkins, Charleston Sanitary District  
Jill Rolfe, Coos County Planning  
Tom Dixon, City of Coos Bay  
Virginia Elandt, ODOT  
Rebecca Jennings, CCAT  
Sergio Gamino, CCAT  
Chelsea Schnabel, City of North Bend  
Mick Snedden, Charleston Fire District  
Matt Whitty, Coos Bay North Bend Water Board

## STAFF

Mark Johnston, Executive Director  
Todd Tripp, Property and Project Manager  
Matt Jensen, Land Use Planner

## CONSULTANTS

3J Consulting  
Kittelson and Associates  
Parametrix  
Leland Consulting

## **The Kilkich Accessible Housing Construction and Rehabilitation Project Budget Narrative**

### **Budget Narrative**

Rich Turi the architect that has been primarily responsible for the design of the majority of housing units in the Kilkich community assisted CIHA staff with development of the budget estimates in June and July of 2019. Budget estimates are based on current construction costs with adjustments for inflation to allow for the planned remodel/rehabilitation activities to take place in Calendar 2020 and the new construction activities to take place in Calendar 2021. Budget estimates for Administrative Costs, Legal and Other Consulting Services, and Site Security were developed by CIHA staff. For purposes of clarity and management coordination, budget estimates have been provided for the Rehabilitation/Remodel separately from the New Construction component of this project. The cost of land has not been included in the budget as the target properties are on Tribal land and were not included as part of the leveraged funds.

Planning and Administration: A total budget allocation of \$248,440 has been provided for administration and oversight costs, amounting to 20% of project hard costs, less than 20% of the total project cost. Anticipated planning and administration activities include the salaries and benefits of staff administering the IHBG – Competitive Grants program, environmental review, project oversight, reporting, and other overhead costs attributable to the project. \$83,900 of the administration costs have been allocated towards the Remodel/Rehabilitation component of the project and \$164,540 has been allocated towards the New Construction part of the project.

Legal and Other Consulting Services: A budget allowance of \$7,200 has been provided for Legal and Other Consulting Services, consisting of \$3,200 for the Rehabilitation/Remodel component and \$4,000 for the New Construction component of the project for any outside consulting needs that may arise during the project.

Architectural and Engineering: A budget allocation of \$32,000 has been provided for Architectural and Engineering services, consisting of \$14,500 for the Rehabilitation/Remodel component and \$17,500 for the New Construction component of the project. This budget estimate is substantially lower than typical costs due to the fact that the primary design of the remodeled units has already been completed and CIHA already owns the plans that are the basis of the new construction. For purposes of budgeting an allocation of \$4,833.33/unit has been estimated to pay for site-specific adjustments for the Rehabilitation/Remodel units and \$5,833.33/unit has been estimated to pay for site-specific design adjustments for the New Construction units.

Site Security: A budget allocation of \$7,000 has been provided for Site Security, consisting of \$3,500 for the Rehabilitation/Remodel component and \$3,500 for the New Construction component of the project. The budget estimate assumes that between June 2020 through September of 2021 building materials will be staged at various sites in the Killich Community. In order to provide additional security to protect the materials and prevent incidents on construction sites, extra security measures, such as temporary fencing, will be required.

Site Development: A budget allocation of \$15,000 has been provided for site development fees, allocated entirely for the New Construction component of the project. The budget estimate addresses site conditions and utility hook-ups. Infrastructure is already to the site, so these costs are relatively modest. The budget assumes \$6,000 for the single family home site and \$9,000 for the site with the duplex.

Permits, Fees, and Inspections: A budget allocation of \$8,000 has been provided for Permits, Fees, and Inspections, consisting of \$4,000 for the Rehabilitation/Remodel component and \$4,000 for the New Construction component of the project. This estimate is based on pricing information provided by the Tribe. Permitting and inspection services are contracted. Costs are set by the Tribe's contractor.

Construction Costs: A budget allocation of \$1,195,200 has been provided for construction costs, consisting of \$405,000 for the Rehabilitation/Remodel component and \$790,200 for the New Construction component of the project. The budget estimate was developed with the assistance of Rich Turi and assumes Rehabilitation/Remodel costs of \$103.79/ sq. ft. and New Construction Costs of \$247.23/sq. ft. Three existing homes of a cumulative 3,902 sq. ft. are scheduled for remodeling and three new units amounting to a cumulative of 3,195 sq. ft. are scheduled for new construction.

Contingency: A budget allocation of \$187,145 has been provided for construction contingency costs, consisting of \$104,875 for the Rehabilitation/Remodel component and \$82,270 for the New Construction component of the project. The budget estimate assumes Rehabilitation/Remodel contingency costs of 25% of the combined construction, site development, and A&E costs. Further, the budget assumes contingency costs of 10% of the combined construction, site development, and A&E costs for New Development. The higher contingency rate for Rehabilitation/Remodel is based on the increased uncertainty that is inherent in renovation of older units.

**Budget Summary**

	<b>Remodel/Rehab</b>	<b>New Construction</b>	<b>Total Project</b>
Planning and Administration	\$83,900	\$164,540	\$248,440
Legal and Consultants	\$3,200	\$4,000	\$7,200
A & E	\$14,500	\$17,500	\$32,000
Site Security	\$3,500	\$3,500	\$7,000
Site Prep	\$0	\$15,000	\$15,000
Permits & Inspect.	\$4,000	\$4,000	\$8,000
Construction	\$405,000	\$790,200	\$1,195,200
Contingency	\$104,875	\$82,270	\$187,145
<b>Total</b>	<b>\$618,975</b>	<b>\$1,081,010</b>	<b>\$1,699,985</b>



# COQUILLE INDIAN TRIBE

3050 Tremont Street North Bend, OR 97459  
Phone: (541) 756-0904 Fax: (541) 756-0847  
[www.coquilletribe.org](http://www.coquilletribe.org)

## **CERTIFICATION OF COMPLIANCE** **Indian Housing Block Grant – Competitive Grants**

1. The applicant certifies that, in carrying out a grant under this NOFA, it will comply with the applicable provisions of Title II of the Civil Rights Act of 1968, and any other applicable federal laws and regulations.
2. The applicant certifies that it will maintain adequate insurance coverage for housing units that are owned and operated or assisted with grant amounts provided under this NOFA.
3. The applicant certifies that 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 this NOFA.
4. The applicant certifies that policies are in effect and are available for review by HUD and the public governing rents and homebuyer payments charged, including the methods by which such rents or homebuyer payments are determined, for housing assisted with grant amounts provided under this NOFA.
5. The applicant certifies that 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 this NOFA.
6. The applicant certifies that it will comply with section 104(b) of NAHASDA governing labor standards and 24 CFR 1000.16 governing labor standards.
7. The applicant certifies that it will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) (42 U.S.C. 4601-4655), the regulations at 49 CFR part 24, and the requirements of 24 CFR 1000.14.

Authorized Official's Name and Title: Brenda Meade, Chairperson

Authorized Official's Signature:

Date:

July 25, 2019

The Coquille Indian Housing Authority is listed on HUD's website at: [https://www.hud.gov/program\\_offices/spm/gmomgmt/grantsinfo/conductgrants](https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants) and therefore does not need to complete the Code of Conduct.



# Coquille Indian Housing Authority

---

2678 Mexeye Loop • Coos Bay, OR 97420

## **ENVIRONMENT REVIEW – EXPRESSION OF INTENT Indian Housing Block Grant – Competitive Grants**

It is the intent of the applicant, in carrying out a grant under this NOFA, to assume all environmental responsibilities under 24 CFR part 58. All required notifications, and approval of a request for Release of Funds and Certification when applicable under 24 CFR part 58 or HUD's approval of the project or activity under 24 CFR part 50, will be completed before committing HUD or non-HUD funds, or taking any other choice limiting action, including but not limited to real property acquisition, demolition, disposition, rehabilitation, repair, new construction, site preparation or clearance, ground disturbance, and leasing.

Authorized Official's Name and Title: Anne F. Cook, Executive Director

Authorized Official's Signature:

Anne F. Cook

Date:

August 1, 2019



# COQUILLE INDIAN TRIBE

3050 Tremont Street North Bend, OR 97459

Phone: (541) 756-0904 Fax: (541) 756-0847

[www.coquilletribe.org](http://www.coquilletribe.org)

## RESOLUTION CY19080

### AUTHORIZING SUBMISSION OF INDIAN HOUSING BLOCK GRANT – COMPETITIVE GRANTS APPLICATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

**WHEREAS,** the Coquille Indian Tribe ("Tribe") is a federally recognized Indian tribe pursuant to the Coquille Indian Restoration Act of June 28, 1989, 25 U.S.C. § 715, et seq. ("the Act"); AND

**WHEREAS,** the Coquille Indian Tribe is governed by the Coquille Tribal Council pursuant to the Tribal Constitution adopted by eligible voters of the Tribe on August 27, 1991, and approved by the Secretary of the Interior on September 9, 1991; and that the Tribal Council is empowered to act for the Coquille Indian Tribe; AND,

**WHEREAS,** the Coquille Indian Tribe is eligible for federal services and benefits including housing and related programs under the Native American Housing Assistance and Self-Determination Act ("NAHASDA"); AND

**WHEREAS,** the Coquille Indian Tribe has established the Coquille Indian Housing Authority as its Tribally-Designated Housing Entity ("TDHE"); AND

**WHEREAS,** the purpose of the Housing Authority is to provide access to decent, safe, and sanitary housing opportunities for Coquille Tribal members and other Native Americans; AND

**WHEREAS,** it is a priority of the Tribe to increase the availability of affordable, accessible housing in the Kilkich community; AND

**WHEREAS,** the Coquille Indian Housing Authority has developed the *Kilkich Accessible Housing Construction and Rehabilitation Project* with a goal of constructing three new housing units and rehabilitating three existing housing units in the Kilkich community; AND

**WHEREAS,** the U.S. Department of Housing and Urban Development has established the Indian Housing Block Grant – Competitive Grants program to support the new construction and rehabilitation of housing that serves American Indian and Alaska Native populations; NOW

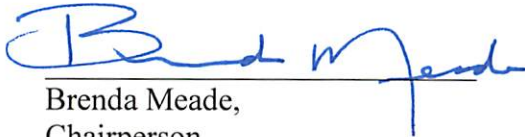
**THEREFORE, BE IT RESOLVED**, that the Tribal Council authorizes the Coquille Indian Housing Authority to submit an application for funding for the FFY 2018-2019 Indian Housing Block Grant – Competitive Grants program on behalf of the Tribe and affirms that the Tribe will not apply for any funding as its own entity from the FFY 2018-2019 Indian Housing Block Grant – Competitive Grants program; AND


**THEREFORE, BE IT FINALLY RESOLVED**, that the Tribal Council Chairperson, or in her absence or unavailability, the Tribal Council Vice Chairperson, is authorized to sign any documents necessary to give this resolution full force and effect.

## CERTIFICATION

The foregoing Resolution was duly adopted at the Tribal Council Meeting held on the Coquille Indian Tribe Reservation in North Bend, Oregon, on July 25, 2019 with the required quorum present by a vote of

6 For; 0 Against; 0 Absent; 0 Abstaining.

  
Brenda Meade,  
Chairperson

  
Linda Mecum,  
Secretary-Treasurer

Cc: Anne Cook, CIHA

## EXHIBIT A

### Coquille Indian Housing Authority Summary of 2019 Indian Housing Block Grant – Competitive Grants Program Application

**Need:** In January 2017, HUD released a study entitled, “Housing Needs of American Indians and Alaska Natives in Tribal Areas: A Report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs.” The findings of this study indicate that housing for American Indian/Alaska Native populations “are substantially worse than other U.S. households, with overcrowding in tribal areas being especially severe.” CIHA has an existing waiting list for affordable housing. Further, CIHA’s Strategic Plan and Indian Housing Plan call for the construction of new affordable and accessible housing units and the rehabilitation of existing housing units to make them Section 504 compliant. However, existing revenue sources are not sufficient to undertake this work at this time.

**Proposed Solution:** To address this issue, HUD recommends increasing investment in construction of new affordable housing and/or rehabilitation of existing affordable housing. As such, the Consolidated Appropriations Acts of 2018 and 2019 provide a total of \$200 million for competitive grants to eligible IHBG recipients authorized under NAHASDA in addition to their existing formula grants.

The Coquille Indian Housing Authority (CIHA) has developed the *Killich Accessible Housing Construction and Rehabilitation Project* plan which calls for the construction of three new housing units in the Killich community – a duplex located at 498/500 Miluk Drive and a single-family unit at 2665 Mexeye Loop. Each unit will include 2 bedrooms, 2 bathrooms, and be accessible under Section 504 standards. Further, the plan calls for the rehabilitation/remodel of three existing housing units that were each constructed in 1996. These units, located at 2608 Mexeye Loop, 2659 Mexeye Loop, and 708 Jis-jia Circle are 3-bedroom, 2-bathroom units and will be renovated to address deteriorating conditions, conform to Section 504 accessibility standards, and extend the overall useful life of these units.

**Budget:** The total project budget as reflected in CIHA’s FY20 Indian Housing Plan is \$1.7 million, with \$255,000 of these funds allocated towards rehabilitation/remodel activities and \$1,445,000 allocated towards new construction. In the FY20 Indian Housing Plan, CIHA has identified \$25,000 of IHBG funds and \$400,000 of non-program funds that it will invest in this project, leaving \$1,275,000 of funding that still must be secured.

**Request:** In accordance with the budget and revenue allocations by source presented in the FY20 Indian Housing Plan, CIHA is in the process of developing a grant proposal to the Indian Housing Block Grant – Competitive Grants (IHBG-CG) program for \$1,275,000. The published guidelines of the IHBG-CG program require a tribally-designated housing entity applying for funding under this program to include a Tribal Resolution, affirming that the Tribe has authorized the application *and* that the Tribe will not apply for IHBG-CG program funds as its own entity during this grant cycle.

**Time is of the Essence:** The IHBG-CG application is currently being prepared but will not be completed until early August 2019. The grant submission due date is August 8, 2019 and requires a signed Tribal Resolution upon submission. The Tribal Council’s current calendar does not provide an opportunity to secure this Tribal Resolution in time for submission after the grant narrative is fully completed. Therefore, this grant summary is being provide in lieu of the completed grant narrative.

This Workspace form is one of the forms you need to complete prior to submitting your Application Package. This form can be completed in its entirety offline using Adobe Reader. You can save your form by clicking the "Save" button and see any errors by clicking the "Check For Errors" button. In-progress and completed forms can be uploaded at any time to Grants.gov using the Workspace feature.

When you open a form, required fields are highlighted in yellow with a red border. Optional fields and completed fields are displayed in white. If you enter invalid or incomplete information in a field, you will receive an error message. Additional instructions and FAQs about the Application Package can be found in the Grants.gov Applicants tab.

**OPPORTUNITY & PACKAGE DETAILS:**

Opportunity Number:	FR-6300-N-48
Opportunity Title:	Indian Housing Block Grant (IHBG) Program--Competitive Grants
Opportunity Package ID:	PKG00250769
CFDA Number:	14.867
CFDA Description:	Indian Housing Block Grants
Competition ID:	FR-6300-N-48
Competition Title:	Indian Housing Block Grant (IHBG) Program--Competitive Grants
Opening Date:	05/07/2019
Closing Date:	08/08/2019
Agency:	Department of Housing and Urban Development
Contact Information:	IHBGCompetitiveProgram@hud.gov

**APPLICANT & WORKSPACE DETAILS:**

Workspace ID:	WS00350353
Application Filing Name:	Coquille Indian Housing Authority
DUNS:	9442129350000
Organization:	COQUILLE INDIAN HOUSING AUTHORITY
Form Name:	Disclosure of Lobbying Activities (SF-LLL)
Form Version:	1.2
Requirement:	Optional
Download Date/Time:	Aug 03, 2019 02:58:25 PM EDT
Form State:	No Errors

**FORM ACTIONS:**

# DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352

OMB Number: 4040-0013

Expiration Date: 02/28/2022

<b>1. * Type of Federal Action:</b> <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. * Status of Federal Action:</b> <input checked="" type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. * Report Type:</b> <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> SubAwardee * Name <input type="text" value="Coquille Indian Housing Authority"/> * Street 1 <input type="text" value="2678 Mexeye Loop"/> Street 2 <input type="text"/> * City <input type="text" value="Coos Bay"/> State <input type="text" value="OR: Oregon"/> Zip <input type="text" value="97420-7713"/> Congressional District, if known: <input type="text" value="OR-004"/>		
<b>5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:</b>     		
<b>6. * Federal Department/Agency:</b> <input type="text" value="HUD"/>	<b>7. * Federal Program Name/Description:</b> <input type="text" value="Indian Housing Block Grants"/> CFDA Number, if applicable: <input type="text" value="14.867"/>	
<b>8. Federal Action Number, if known:</b> <input type="text"/>	<b>9. Award Amount, if known:</b> \$ <input type="text"/>	
<b>10. a. Name and Address of Lobbying Registrant:</b> Prefix <input type="text"/> * First Name <input type="text" value="None"/> Middle Name <input type="text"/> * Last Name <input type="text" value="None"/> Suffix <input type="text"/> * Street 1 <input type="text" value="None"/> Street 2 <input type="text"/> * City <input type="text" value="None"/> State <input type="text"/> Zip <input type="text"/>		
<b>b. Individual Performing Services</b> (including address if different from No. 10a) Prefix <input type="text"/> * First Name <input type="text" value="None"/> Middle Name <input type="text"/> * Last Name <input type="text" value="None"/> Suffix <input type="text"/> * Street 1 <input type="text" value="None"/> Street 2 <input type="text"/> * City <input type="text" value="None"/> State <input type="text"/> Zip <input type="text"/>		
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.  * Signature: <input type="text" value="Completed on submission to Grants.gov"/> * Name: Prefix <input type="text"/> * First Name <input type="text" value="Anne"/> Middle Name <input type="text"/> * Last Name <input type="text" value="Cook"/> Suffix <input type="text"/> Title: <input type="text" value="Executive Director"/> Telephone No.: <input type="text" value="541-888-6501"/> Date: <input type="text" value="Completed on submission to Grants.gov"/>		
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form - LLL (Rev. 7-97)

This Workspace form is one of the forms you need to complete prior to submitting your Application Package. This form can be completed in its entirety offline using Adobe Reader. You can save your form by clicking the "Save" button and see any errors by clicking the "Check For Errors" button. In-progress and completed forms can be uploaded at any time to Grants.gov using the Workspace feature.

When you open a form, required fields are highlighted in yellow with a red border. Optional fields and completed fields are displayed in white. If you enter invalid or incomplete information in a field, you will receive an error message. Additional instructions and FAQs about the Application Package can be found in the Grants.gov Applicants tab.

**OPPORTUNITY & PACKAGE DETAILS:**

Opportunity Number:	FR-6300-N-48
Opportunity Title:	Indian Housing Block Grant (IHBG) Program--Competitive Grants
Opportunity Package ID:	PKG00250769
CFDA Number:	14.867
CFDA Description:	Indian Housing Block Grants
Competition ID:	FR-6300-N-48
Competition Title:	Indian Housing Block Grant (IHBG) Program--Competitive Grants
Opening Date:	05/07/2019
Closing Date:	08/08/2019
Agency:	Department of Housing and Urban Development
Contact Information:	IHBGCompetitiveProgram@hud.gov

**APPLICANT & WORKSPACE DETAILS:**

Workspace ID:	WS00350353
Application Filing Name:	Coquille Indian Housing Authority
DUNS:	9442129350000
Organization:	COQUILLE INDIAN HOUSING AUTHORITY
Form Name:	Grants.gov Lobbying Form
Form Version:	1.1
Requirement:	Optional
Download Date/Time:	Aug 03, 2019 03:00:58 PM EDT
Form State:	No Errors

**FORM ACTIONS:**

---

## CERTIFICATION REGARDING LOBBYING

### Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### \* APPLICANT'S ORGANIZATION

Coquille Indian Housing Authority

#### \* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE

Prefix:  \* First Name:  Middle Name:   
\* Last Name:  Suffix:   
\* Title:

\* SIGNATURE:

\* DATE:

---

## Designated Qualified Opportunity Zones

This document was updated **December 14, 2018**, to reflect the final Qualified Opportunity Zone designations for all States.

*Please note that the below list of designated tracts is not the official list. The official list will be published in the Internal Revenue Bulletin at a later date.*

Click arrow to filter state

State	County	Census Tract Number	Tract Type	ACS Data Source
Oklahoma	Tulsa	40143007608	Low-Income Community	2011-2015
Oklahoma	Tulsa	40143008001	Low-Income Community	2011-2015
Oklahoma	Tulsa	40143008002	Low-Income Community	2011-2015
Oklahoma	Tulsa	40143009300	Low-Income Community	2011-2015
Oklahoma	Tulsa	40143011100	Low-Income Community	2011-2015
Oklahoma	Wagoner	40145030102	Low-Income Community	2011-2015
Oklahoma	Washington	40147000300	Low-Income Community	2011-2015
Oregon	Baker	41001950500	Low-Income Community	2011-2015
Oregon	Benton	41003000100	Low-Income Community	2011-2015
Oregon	Benton	41003010600	Low-Income Community	2011-2015
Oregon	Clackamas	41005022107	Low-Income Community	2011-2015
Oregon	Clackamas	41005022108	Low-Income Community	2011-2015
Oregon	Clackamas	41005022201	Low-Income Community	2011-2015
Oregon	Clackamas	41005022400	Non-LIC Contiguous	2011-2015
Oregon	Clackamas	41005022500	Low-Income Community	2011-2015
Oregon	Clackamas	41005024400	Low-Income Community	2012-2016
Oregon	Clatsop	41007950300	Low-Income Community	2011-2015
Oregon	Columbia	41009970700	Low-Income Community	2011-2015
Oregon	Coos	41011000300	Low-Income Community	2011-2015
Oregon	Coos	41011000504	Low-Income Community	2011-2015
Oregon	Crook	41013950300	Low-Income Community	2011-2015
Oregon	Curry	41015950100	Low-Income Community	2011-2015
Oregon	Deschutes	41017000900	Low-Income Community	2011-2015
Oregon	Deschutes	41017001500	Low-Income Community	2011-2015
Oregon	Deschutes	41017001600	Low-Income Community	2011-2015
Oregon	Deschutes	41017001800	Low-Income Community	2011-2015
Oregon	Douglas	41019010000	Low-Income Community	2011-2015
Oregon	Douglas	41019130000	Low-Income Community	2011-2015
Oregon	Harney	41025960100	Low-Income Community	2011-2015
Oregon	Hood River	41027950100	Non-LIC Contiguous	2011-2015
Oregon	Hood River	41027950300	Low-Income Community	2011-2015
Oregon	Jackson	41029000100	Low-Income Community	2011-2015
Oregon	Jackson	41029001200	Low-Income Community	2011-2015
Oregon	Jackson	41029001301	Low-Income Community	2011-2015
Oregon	Jefferson	41031940000	Low-Income Community	2011-2015
Oregon	Jefferson	41031960202	Low-Income Community	2011-2015
Oregon	Josephine	41033360500	Low-Income Community	2011-2015
Oregon	Klamath	41035970200	Low-Income Community	2011-2015
Oregon	Klamath	41035971800	Low-Income Community	2011-2015
Oregon	Lake	41037960200	Low-Income Community	2011-2015
Oregon	Lane	41039003302	Low-Income Community	2011-2015
Oregon	Lane	41039003600	Non-LIC Contiguous	2011-2015
Oregon	Lane	41039003700	Low-Income Community	2011-2015
Oregon	Lane	41039003900	Low-Income Community	2011-2015
Oregon	Lane	41039004300	Low-Income Community	2011-2015
Oregon	Lincoln	41041950304	Low-Income Community	2012-2016
Oregon	Linn	41043020100	Low-Income Community	2011-2015
Oregon	Linn	41043020400	Low-Income Community	2011-2015
Oregon	Malheur	41045970300	Low-Income Community	2011-2015
Oregon	Malheur	41045970500	Low-Income Community	2011-2015
Oregon	Marion	41047000200	Low-Income Community	2011-2015
Oregon	Marion	41047000300	Low-Income Community	2011-2015
Oregon	Marion	41047001000	Low-Income Community	2011-2015

# Coquille Indian Housing Authority



June 18, 2019 2:26:59 PM

## Designated Opportunity Zone Tracts

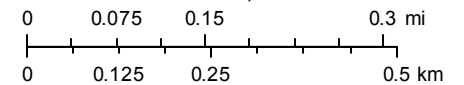
- Opportunity Zone Tracts
- Census Tracts
- Federal Indian Reservation



State Census Boundaries



1:10,232



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand),

Opportunity Zone Designation