

November 14, 2025

Coquille Indian Tribe
Tribal Council

Coquille Indian Housing Authority
Board of Commissioners

SELF-MONITORING REPORT

INTRODUCTION

An Annual Compliance Assessment of the Coquille Indian Housing Authority's (CIHA) Indian Housing Block Grant (IHBG) program was conducted November 4-13, 2025 covering the program year 2025. The assessment was conducted as required by the Coquille Indian Tribe's Self-Monitoring Policy adopted by Tribal Council Resolution CY0254 and in accordance with the requirements of the implementing regulations of the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA) found at 24 Code of Federal Regulations (CFR) Part 1000.502. The CIHA Board of Commissioners, Executive Director, and staff utilized the HUD Office of Native American Programs Monitoring Plan checklists to complete the assessment.

Monitoring Committee:

Paul Doyle, Chairperson	Anne Cook, Executive Director
Dennie Hunter, Vice-Chairperson	Marcy Chytka, Accounting Manager
Jackie Chambers, Commissioner	Debbie Dennis, Operations Manager
Don Garrett, Commissioner	Tracey Mueller, Housing Programs Manager
Judy Rocha, Commissioner	Scott Platter, Projects Supervisor

Areas Reviewed:

1. APR and IHP
2. Organization and Structure
3. Environmental Review
4. Financial and Fiscal Management
5. Procurement and Contract Administration
6. Labor Standards
7. Lead-Based Paint
8. Section 504 Accessibility
9. Maintenance and Inspection
10. IHBG Self-Monitoring
11. Admissions and Occupancy
12. BIA ARP HIP Homeowner Assistance Repair Program (HARP)
13. Oregon Department of Energy Community Heat Pump Deployment Program (CHPDP)

The Monitoring Committee chose to classify review results in three ways:

1. Recommendations – Suggested improvements to existing procedures which are not deficiencies but which could assist management and staff in improving the performance of the organization.
2. Concerns – Deficiencies in performance but not violations of statutory or regulatory requirements. Recommendations are provided for correcting any areas of concern.
3. Findings – Clear violations of statutory or regulatory requirements. Findings require corrective action.

ASSESSMENT RESULTS

1. IHP and APR

Chairperson Paul Doyle interviewed Executive Director Anne Cook to assess the Authority's IHP and APR compliance. Chairperson Doyle reviewed files and documents pertaining to this area and found all documentation to be organized and complete.

No recommendations, concerns, or findings were noted.

2. Organization and Structure

Chairperson Paul Doyle interviewed Executive Director Anne Cook to review the organization and administration of the programs. Chairperson Doyle also reviewed the Authority's files and documents which addressed this area.

No concerns or findings were noted.

Recommendations

Policy Review

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. Although its existing policies and procedures comply with statutory requirements, the Authority is encouraged to continue its efforts to review and streamline its policies to improve consistency across programs and ensure that its programs are aligned with strategic priorities and best practices.

Organizational Chart

The Authority's Organizational Chart should be updated to reflect job title and staffing changes that occurred during the program year.

PILOT LCA

The Authority may wish to renew efforts to transition its current local cooperative agreement arrangements to the County.

3. Environmental Review

Chairperson Paul Doyle interviewed Executive Director Anne Cook regarding the Authority's environmental review compliance and examined the Authority's environmental review records. All activities were addressed as required and reviews completed prior to the expenditure of funds.

No recommendations, concerns, or findings were noted.

4. Financial and Fiscal Management

Vice Chair Denise Hunter, Commissioner Don Garrett, and Commissioner Judy Rocha interviewed Accounting Manager Marcy Chytka to determine present procedures.

Reviewers selected random computer-generated samples, conducted tests, and reviewed documents to determine compliance with applicable standards for financial reporting, maintaining accounting records, cash management, allowable costs, insurance, internal controls, and separation of duties. The Reviewers noted that the most recent annual financial audit reported no findings. No exceptions were found in the Reviewers' tests of the financial management systems.

No concerns or findings were noted.

Recommendations

Consider Revising Customer Billing Statements to Improve Clarity and Readability

Accounts receivable billing statements are confusing to CIHA customers; it is recommended that the Accounting Manager revise the statements to be more easily understood.

It was noted that the Authority will begin transitioning to electronic customer statements in FY 2026.

Requirement to Calculate Program Income on the Cash Basis

The FY 2012 Self-Monitoring Report noted that HUD requires the cash basis method be used in calculating program income for 1937 Housing Act rental units. The Authority calculates its program income allocation on an accrual basis rather than the cash basis. Because of the excellent record the Authority has with collection of its tenant rents each

month, the difference between these two amounts for purposes of computing program income is not material. The Accounting Manager is aware of this requirement and continues to monitor this area for significant changes. Accounting for this area will be converted to the cash basis if tenant receivable balances warrant such a change.

5. Procurement and Contract Administration

Commissioner Judy Rocha and Commissioner Don Garrett interviewed Operations Manager Debbie Dennis and Projects Supervisor Scott Platter to determine present procedures. A random sampling of ten records for purchases over \$10,000 were tested to determine if proper procedures were used for expenditures in excess of the Authority's micro-purchase policy.

Tests revealed that all procurements over this threshold were properly documented and followed the solicitation method required by the Authority policy in all instances. In addition, based on the Reviewers' tests of those purchases made within the micro-purchase policy, it was evident that the Authority attempted to purchase from multiple sources to achieve competitive pricing of products. The Authority should be commended on this practice as it reflects the realization that the \$10,000 requirement is mandated, but the conscientious practice of getting the best price for the Authority's funds is the real goal.

No recommendations, concerns or findings were noted.

6. Labor Standards

Commissioner Judy Rocha and Commissioner Don Garrett interviewed Operations Manager Debbie Dennis and Projects Supervisor Scott Platter and reviewed documents to determine the Authority's compliance with Federal Labor Standards. The Authority uses HUD-determined or Davis-Bacon wage rates as dictated by the type of work. All certified payrolls were reviewed, where required by the type of work, to verify that the Authority was following proper procedures and to ensure compliance with Davis-Bacon standards. It was noted that the files are well organized and up to date. No exceptions were observed.

No concerns or findings were noted.

Recommendations

Tribally Determined Wage Rates

The Authority could consider collaboration with the Tribe to establish Tribally Determined Wage Rates to replace the current HUD-determined and Davis-Bacon wage rates as permitted by existing regulations. The change might simplify procedures for staff and contractors involved in CIHA projects where these labor standards are applicable.

7. Lead-Based Paint

Chairperson Paul Doyle interviewed Housing Programs Manager Tracey Mueller to determine and verify present procedures. When a Monthly Housing Assistance Program (MHAP) tenant-based rental assistance applicant has children under the age of six in the household and wishes to reside in a home built before 1978, the home must be tested for lead-based paint by a qualified inspector. During the period, two units required testing. Both units failed initial inspection and required remediation. One unit passed on reinspection. One landlord declined to perform the necessary remediation. The applicant chose not to participate in the MHAP program.

No recommendations, concerns, or findings were noted.

8. Section 504 Accessibility

Commissioner Judy Rocha and Commissioner Don Garrett interviewed Operations Manager Debbie Dennis and Projects Supervisor Scott Platter.

The IHBG Competitive Grant for the purpose of rehabilitating three existing rental units to Section 504 standards and constructing three new rental units to Section 504 standards is allowing CIHA to increase the number of Section 504 compliant units on Tribal lands. The rehabilitation portion of the project began in FY 2023 and was completed in FY 2024, bringing CIHA into full compliance with a total of six units that meet Section 504 accessibility standards. Construction of the three new Section 504 compliant rental units is scheduled to begin in FY 2026, which would bring the total number of Section 504 compliant units to nine.

Additionally, the Authority continues to make modifications to its other rental units upon request to accommodate specific needs.

No recommendations, concerns, or findings were noted.

9. Maintenance and Inspection

Commissioner Judy Rocha and Commissioner Don Garrett interviewed Operations Manager Debbie Dennis and Projects Supervisor Scott Platter.

Interior inspections, maintenance, repairs, appliance replacements, exterior preventive maintenance, and preparation for re-occupancy were performed by staff and contractors during FY 2025.

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

No recommendations, concerns, or findings were noted.

10. IHBG Self-Monitoring

Chairperson Paul Doyle interviewed Executive Director Anne Cook and reviewed documents related to the Authority's self-monitoring program. In the last HUD monitoring report, it was noted that the Authority's self-monitoring program was exemplary. The comprehensive approach taken by the Authority continues to address all areas of compliance mandated by HUD and as necessitated by other program activities.

No recommendations, concerns, or findings were noted.

11. Admissions and Occupancy

Chairperson Paul Doyle interviewed Housing Programs Manager Tracey Mueller to determine present procedures. Ten participant files each from the Low Rent Program, HomeGO Program, and MHAP Programs were evaluated from random computer-generated samples and found in compliance in all areas with no exceptions.

No recommendations, concerns, or findings were noted.

12. BIA ARP HIP Homeowner Assistance Repair Program (HARP)

Commissioner Jackie Chambers interviewed Operations Manager Debbie Dennis to determine present procedures and compliance with the Homeowner Assistance Repair Program (HARP) BIA ARP HIP Subrecipient Agreement, CIHA policy, and other applicable requirements. A random sampling of ten HARP program participant files were reviewed and found to be in compliance with all aspects of the program. Checklists were utilized to monitor eligibility, use and management of funds, administrative costs, and reporting requirements. No exceptions were found.

No recommendations, concerns or findings were noted.

13. Oregon Department of Energy Community Heat Pump Deployment Program (CHPDP)

Commissioner Jackie Chambers interviewed Operations Manager Debbie Dennis to determine present procedures and compliance with the Oregon Department of Energy Community Heat Pump Deployment Program (CHPDP) agreement, CIHA policy, and other applicable requirements. A random sampling of ten CHPDP program participant files were reviewed and were found to be in compliance with all aspects of the program and grant agreement. Checklists were utilized to monitor eligibility, use and management of funds, administrative costs, and reporting requirements. No exceptions were found.

No recommendations, concerns or findings were noted.

CONCLUSION

The Monitoring Committee concurs that the IHBG program is well managed and substantially in compliance with the requirements of NAHASDA. The Authority is commended for its outstanding TARs rate, which was 0.0% for the FY 2025 period.

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

Respectfully submitted,

Monitoring Committee