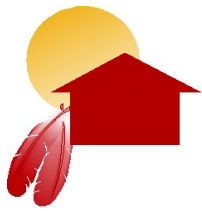


**2020**

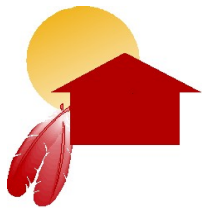
This monitoring plan is designed to assist a tribe or tribally designated housing entity to conduct self-monitoring of its performance and compliance with pertinent requirements and is virtually identical to the plan that the Office of Native American Programs uses.

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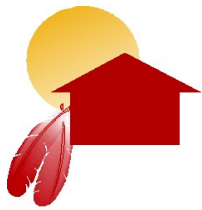
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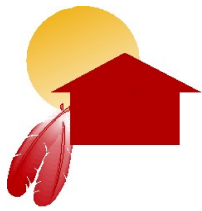
TRIBE/TDHE NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
<b>I. Purpose</b>				
<p>The purpose of this review is to assess the day-to-day operation of the tribe/TDHE's overall organization, structure, and administration. The review is intended to determine the tribe/TDHE's implementation of key areas of authority, appropriate lines of reporting, and adequate controls to ensure assets are safeguarded.</p>	<p>NAHASDA, Sections 403(c) and 405(b)(1)(ii)</p> <p>24 CFR Part 84 (nonprofit) 24 CFR Part 85 24 CFR 1000.26 24 CFR 1000.524 24 CFR Part 1003 (ICDBG)</p>	<p>ICDBG, ROSS, and RHED/RIF NOFAs for the year grant was funded.</p>		<p>See Other Programs Monitoring Plan for web links to ICDBG, ROSS, and RHED/RIF NOFAs.</p> <p>Read &amp; Noted</p>
<b>II. Pre-Review Preparation</b>				-
<p>A. If available, review the following documents as they pertain to organization and structure:</p> <ol style="list-style-type: none"> <li>1. Most recent IHP, approved IHP amendments, IHP amendments in process</li> <li>2. Policies and procedures (see section III for review instructions)</li> <li>3. Previous monitoring findings</li> <li>4. Previous self-monitoring report(s)</li> <li>5. Previous audit findings and/or work papers</li> <li>6. Corrective actions status for findings</li> <li>7. Current enforcement actions</li> <li>8. Valid complaints</li> <li>9. Relevant correspondence</li> </ol>				Read & Noted



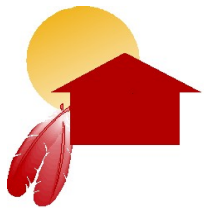
TRIBE/TDHE NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
B. Indian Preference				-
1. Identify whether prior ONAP monitoring reports addressed noncompliance with Indian preference requirements.				No non-compliance noted in last review done in 2007.
a. If a monitoring finding remained unresolved, the on-going noncompliance is a continuing problem.				N/A
2. Review the audits for findings and/or comments on compliance with Indian preference.				None - No findings in 2018 Audit; 2019 Audit is still in process – completion is later this year due to COVID19. Housing was chosen as a major program for 2019 Audit.
a. If an audit finding remained unresolved, the on-going noncompliance is a continuing problem.				N/A
3. Review any Indian preference complaints received by the tribe/TDHE during the review period.	24 CFR 1000.54 24 CFR 1003.510 (e)	See Attached		No complaints in 2020 to date
<b>III. Review</b>				-
<b>A. Policies and Procedures/Records Management</b>				-
1. Has the tribe/TDHE adopted the required policies; i.e., rent and homebuyer policy; eligibility, admission, and	NAHASDA Sec. 102(b)(2)(d) and 102(c)			Yes, most policies are current and in place, but edits and revisions are always ongoing to ensure they meet our program needs and reflect our



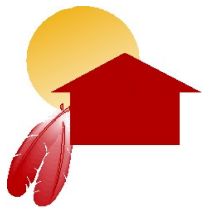
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				program operations accurately. A major update to our Tribally Owned Rental Housing Policy is currently underway and will be completed before our 34 <sup>th</sup> Street development accepts tenants. Additionally, an additional to our current finance policy to address Section 3 requirements is under review for next revision.
occupancy; management and maintenance, tenant and homebuyer selection, relocation and real property acquisition; drug free workplace, Indian preference, Section 3?	24 CFR 1000.14 24 CFR 1000.26 24 CFR 1000.42 24 CFR 1000.46 24 CFR 1003.510			Read & Noted
2. Do meeting minutes confirm that the tribe/TDHE is following its policies?				Yes, all changes in policies are done by Tribal Council as a Resolution. Tribal Council will also call upon the Housing Committee as needed for input on changes.
3. Do the minutes confirm that staff is following its policies?				Minutes reflect the review of the monthly housing report detailing program activities, and monthly expenditures are reported by the Controller. Minutes reflect no compliance issues in 2020.
4. Do the minutes reveal any instances where tribal/TDHE officials have interfered with the Tribal Council/Board of Commissioners and/or staff in enforcing its policies?				No.
<b>B. Tribal Council/Board of Commissioners</b>				-
1. Does the Tribal Council/Board of Commissioners provide guidance and				No, just policy oversight and strategic planning.



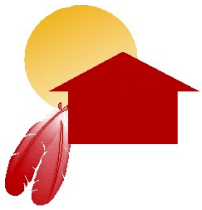
TRIBE/TDHE NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
direction to management?				
2. If applicable, does the governing body review and evaluate the performance of the Housing Director/Executive Director?	24 CFR 1000.506			No, HR, HHS Director, and the GM are involved in that process.
3. Does the Tribal Council/Board of Commissioners adhere to all laws, regulations, and policies?				Yes
a. Review meeting minutes for evidence of noncompliance with federal requirements and recipient policies.				None noted.
b. Interview staff and program participants for opinions on compliance.		See Attached		Samish has an Appeals Board in place to address any complaints or concerns related to compliance with policy for participants. Program operational compliance is reviewed through establish internal controls in the program and accounting functions for daily activity and is also reviewed formally during the annual self-monitoring process.
c. Review financial reports for compliance with federal accounting requirements.				Reviewed and found compliant.
d. Review policies for compliance with federal requirements.				Reviewed and found compliant. Section 3 is not yet addressed as our program has not needed thus far, but will be included prior to need.
4. Have Tribal Council/Board of Commissioners members placed their				No, and no waitlist in 2020



<b>TRIBE/TDHE NAME:</b>	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
relatives in housing ahead of others on the waiting list? (Note: this should also be cited in the Occupancy Monitoring Plan.)				
5. Does the Tribal Council/Board of Commissioners allow the recipient to operate without undue interference?				Yes
a. Does the Tribal Council/Board of Commissioners interfere with the day-to-day operations of the recipient?				No
b. Does the Tribal Council/Board of Commissioners override internal or financial controls put in place for the recipient's staff?				No
6. Does the Tribal Council/Board of Commissioners convey the message that integrity and ethical values are not compromised?				Yes
7. Are Tribal Council/Board of Commissioners minutes transcribed and stored to preserve a history of the Tribal Council/Board of Commissioners actions?				Yes, and the program has access to those minutes online.

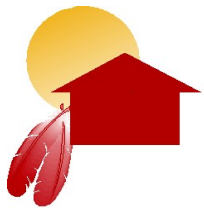


<b>TRIBE/TDHE NAME:</b>	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
8. Are Tribal Council/Board of Commissioners meetings held in accordance with the terms of the bylaws?				Yes
9. Is there evidence of a hostile environment?				No
10. Is the amount of Tribal Council/Board of Commissioners travel paid with HUD funds excessive?				No. No Council travel costs were applied to the program in 2020 to date.
11. Are financial reports reviewed as part of each regular monthly Tribal Council/Board of Commissioners meeting?				Yes, the Controller presents financial data monthly.
12. Do Tribal Council/Board of Commissioners members receive a stipend to attend meetings?				Yes, but not paid using program funds - only paid using discretionary TYEE funds.
a. If so, is the stipend reasonable in accordance with local practice and ONAP Program Guidance?		Program Guidance 98-13t		N/A
<b>C. Conflict of Interest</b>				-
1. Is there a written Code of Conduct or Conflict of Interest statement or policy?	24 CFR 85.36(a)(3) 24 CFR 1000.30 24 CFR 1000.34 24 CFR 1003.606	See Attached		Yes: Personnel Policy 5-04-001 Conduct Policy Finance: 4.002(d)(2)(D), 4.009 (3)(F)4(A), 4.012 (c)(2) Housing 13.300

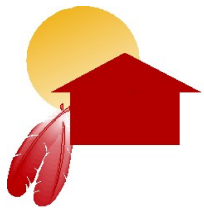


<b>TRIBE/TDHE NAME:</b>	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
2. Has the statement or policy been adopted by the Tribal Council/Board of Commissioners?				Yes, by Resolution
3. Does the Tribal Council/Board of Commissioners follow the policy?				Yes
<p><b>D. Complaints and Grievances</b></p> <p>NOTE. This section applies only to complaints and grievances by staff and board members.</p>				
1. Is there a written policy or procedure to cover the management of complaints and grievance resolution?	24 CFR 85.36(a)(3) 24 CFR 85.36 (b)(12) 24 CFR 1000.54	Program Guidance 2001-06		Yes: For staff and Council the Appeals Board Ordinance would be used to address complaints and grievances. For Clients, section 13.207 in the Housing Program Policy addresses complaints and grievances and clients are given a form to complete to verify they are aware of that process.
2. Does the tribe/TDHE have a method to track grievances to ensure that they are resolved?				Yes, HR has a tracking system in place and oversees complaints or grievances for staff and board. Clients' complaints/grievances are formally processed through the Appeals Board and an informal system is in place within

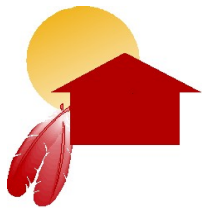




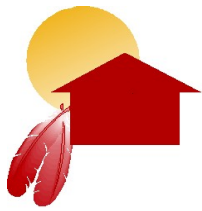
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				<p>department that issues a corrective action for procedures and needed policy updates.</p> <p>Program is considering creating a written procedure for the interpretation and application of criminal history results. This procedure will aim to classify by type of charge, degree of charge and time since charge to create a uniform application for the program of reasonableness under the policy for participation in TBRA. This update is expected to be in place in late 2020 – early 2021.</p> <p>The inclusion of this new procedure will be to create a list that will be provided to clients and signed with their intake application.</p> <p>This process should help eliminate any individual interpretation by the department and move the burden of individual interpretation to the Appeal Board on a case by case basis.</p>
3. Is there a provision for an impartial hearing panel or alternate dispute resolution?				Yes, the Appeals Board.
4. Are complaints and grievances resolved promptly, with fair and reputable action by the tribe/TDHE?				Yes, process is within 30 days.
<b>E. IHP Certification</b>				-



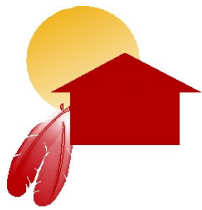
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1. Has the Tribal Council/Board of Commissioners executed the certificate of compliance in the IHP?		IHP Certification of Compliance		Yes, by Resolution #2019-09-003 for 2020.
2. Does documentation confirm that the recipient is in compliance with its certification?				Yes
a. Did the tribe/TDHE comply with Title II of the Civil Rights Act of 1968, to the extent that such title is applicable, and other applicable federal statutes?				Yes
b. If applicable, are there households within the tribe/TDHE's jurisdiction at or below 80 percent of median income?				Yes, all current program participants are at or under 80% of median income. 3 program participants became over-income in 2020 and were discharged from the program. <i>See "Rental Assistance Code 2020"</i> in program files.
3. Are the following policies available for review by both HUD and the public?	NAHASDA, Section 203			Yes, available for public review at the HHS and Administrative lobbies and available upon request to department by HUD. Due to COVID19 office closures, these policies have also been added to the Housing Department's page on our website to ensure public access.
a. Eligibility, admissions, and occupancy.	NAHASDA, Section 203(d)			Yes, see above – Housing 13.500
b. Rents charged and methods of calculation.	NAHASDA, Sec. 203(a)			Yes, see above – Housing 13.500
c. Management and maintenance of	NAHASDA, Sec.			Yes, see above – Housing 13.400



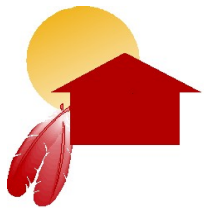
<b>TRIBE/TDHE NAME:</b>	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
assisted housing.	203(b)			
<b>F. Insurance</b>				
1. Does the tribe/TDHE provide proof of insurance to indemnify from loss against fire, weather, and liability claims for all IHBG-assisted housing units owned or operated by the tribe/TDHE?	24 CFR 1000.136 24 CFR 1003.202			N/A in 2020
2. Has the tribe/TDHE produced a copy of the certification of insurance, including an inventory of the structures and buildings insured?	24 CFR 1000.136 24 CFR 1000.138 24 CFR 1000.38 24 CFR 1003.202			N/A in 2020
3. Are the vehicles and other equipment properly insured?				Yes, the program specific vehicles are insured under the Tribe's policies and fleet procedures which are managed by HR and Planning Dept.
4. Does the tribe/TDHE effectively maintain an insurance file that includes a history of claims and other pertinent information?				Yes, it is managed by HR and Accounting Dept.
<b>G. Administrative Climate</b>				
1. Is there evidence of frequent staff turnover among key positions?				Not in 2020 to date
2. Is there frequent staff turnover in finance?				Not in 2020 to date



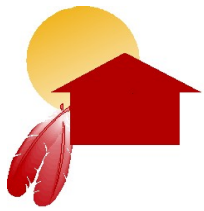
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3. Is there frequent staff turnover in maintenance?				None in 2020; no HUD specific maintenance staff to date in 2020.
4. Is there a lack of seniority among staff?				No
5. Is there an accurate organization chart available on site?				Yes, it is available on the Samish Intranet site, under HR.
6. Is there an emphasis on training and educational opportunities for staff and Tribal Council/Board of Commissioners members?				Yes, especially online this year for COVID19 changes in operations and implementation.
7. Are the appropriate staff and Tribal Council/Board of Commissioners members attending training?				Yes
8. Is the training adequate?				Yes, in conjunction with targeted TA from our Grants Management contacts at HUD
<b>H. Record Retention</b>	24 CFR 85.42 24 CFR 84.53			
1. Are records maintained for 3 years from the last APR submission that would support data and information reported in the APR?  NOTE: APR documentation would include financial reports, meeting minutes, program performance and evaluation documents, contracts, policies, etc.	24 CFR 1000.552			Yes, we have a retention policy in place at Samish that is followed. The current Records Retention was last updated in October 2019, as attached.



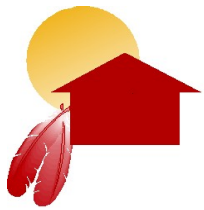
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2. Are financial and project completion records available to support project close out?				Yes
3. Are financial records available to support the independent audit?				Yes
4. Does the tribe/TDHE have an effective file management and records retention system?				Yes.
<b>I. Indian and Tribal Preference in Employment and Hiring</b>				-
<p>The purpose of the review is to determine compliance with the Indian and tribal preference requirements under the Indian Self Determination Act, NAHASDA, and the ICDBG regulations.</p> <p>Section 7(b) of the Indian Self-Determination and Education Assistance Act provides that any contract, subcontract, grant, or subgrant pursuant to NAHASDA shall require that, to the greatest extent feasible: 1) preference and opportunities for training and employment shall be given to Indians; and 2) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned economic enterprises.</p> <p>Section 101 (k) of NAHASDA allows a tribe to adopt</p>	<p>Section 7(b) of P.L. 93-638 (Indian Self Determination Act)</p> <p>NAHASDA, Section 101, (k)</p> <p>24 CFR 1000.48 24 CFR 1000.50 24 CFR 1000.52 24 CFR 1000.56 24 CFR 1003.510</p>			<p>Read &amp; Noted</p> <p>Finance: 4.009(b)(5); 4.009(c)(2)(D); 4.012(c)(1)(c).</p> <p>Personnel: Part 3-Section 5-03-003</p>



<b>TRIBE/TDHE NAME:</b>	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
tribal preference in employment and contracting. The tribal employment and contract preference laws (including regulations and tribal ordinances) must be adopted by the Indian tribe that receives the preference. NOTE: Indian and tribal preference requirements should be referenced in both the procurement policy and personnel policy.				
A. Review the tribe/TDHE's policies to determine if they are compliant with the requirements.				Reviewed and found compliant
B. If complaints regarding Indian or tribal preference were filed, determine if the procedures for addressing the complaints are consistent with program requirements.		See Attached		No complaints in 2020
C. Determine if the tribe/TDHE complies with the Indian preference requirements in employment and hiring.	24 CFR 1000.48 24 CFR 1000.50 24 CFR 1000.52 24 CFR 1003.510			-
1. Interview staff and review files to determine if the tribe/TDHE has provided hiring preference and training opportunities to Indians and Alaska Natives.		See Attached		Seven Native Americans were hired in 2020, 3 permanent and 4 temporary hires
a. If problems are noted in the staff				N/A



<b>TRIBE/TDHE NAME:</b>	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
interview process, research the records to determine if a violation exists.				
<b>IV. Summary</b>				
<p>Develop the monitoring report by summarizing the following:</p> <ol style="list-style-type: none"> <li>1. Compliance with requirements</li> <li>2. Violations of the applicable statutes, regulations, or local laws and authorities</li> <li>3. Corrective actions that should be taken to address programmatic concerns</li> </ol>				<p>Program in compliance and no areas of weakness found.</p> <p>Improvements:</p> <ul style="list-style-type: none"> <li>• Current Pending Policy Revisions at the time of review: <ul style="list-style-type: none"> <li>- Added clarification to Inspection clause in policy by separating pre-occupancy and annual inspections and adding procedures for each.</li> <li>- Added clause to require verifiable income and sufficient income be maintained for program participation</li> <li>- Added a 30-day notice period for termination</li> <li>- Added that program will establish TBRA income annually unless a change over 20% occurs, at which point the client must notify staff.</li> <li>- Added a general clause requiring ethical behavior of program participants</li> <li>- Adding a new policy clause and procedure for interpreting criminal background check results using</li> </ul> </li> </ul>



TRIBE/TDHE NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
				matrix for evaluations that can better meet the need of our community while also eliminating the need for program staff to make case by interpretations.

*Sharon Paskewitz* 9/10/2020

<b>Reviewer Name:</b>	Sharon Paskewitz, Housing Director 09-10-2020
<b>Review Date(s):</b>	9/03/2020 and 9/10/2020
<b>Supervisor Name:</b>	<i>Carey Thurston</i> 9/16/2020





*Samish Indian Nation*

OF WASHINGTON

**Motion: 2019-09-007**

**Resolution: 2019-09-003**

**Date Approved: September 21, 2019**

**Subject: Indian Housing Plan 2020**

**WHEREAS,** the Samish Indian Nation was Federally re-acknowledged by the Assistant Secretary of the Department of the Interior of the United States of America on April 6, 1996; and

**WHEREAS,** the Samish Tribal Council is empowered to act on behalf of the Samish Indian Nation pursuant to Article VI, Section 2, of the Samish Tribal Constitution, approved November 14, 2003, by Resolution of the Samish Tribal Council and adopted and ratified by Vote of the Samish General Council on March 2, 2004 and recognized by the Assistant Secretary for Indian Affairs, David W. Anderson on April 20, 2004; and

**WHEREAS,** the health, safety, welfare and education of the Indian people of the Samish Indian Nation is the responsibility of the Tribal Council of the Samish Indian Nation; and

**WHEREAS,** the Samish Tribal Council recognizes the Native American Housing Assistance and Self-Determination Act (NAHASDA) Indian Housing Plan (IHP) needs to be submitted to Housing and Urban Development (HUD) to assure continued services provided to Tribal members.

**THEREFORE BE IT RESOLVED** the Samish Tribal Council has reviewed the attached Grant Review Form and the 2020 NAHASDA IHP with the estimated amounts of \$811,454 to be received in 2020 and \$3,057,136.11 of carryover funds, for an estimated total amount of \$3,868,590.11 and directs that it be submitted to HUD;

**BE IT FURTHER RESOLVED,** the Samish Tribal Council authorizes the Chairman and/or designee to sign, submit, negotiate, amend, modify the agreement.

**SAMISH TRIBAL COUNCIL**

By: 

**Thomas D. Wooten**  
**Tribal Chairman**

**CERTIFICATION**

The above resolution was duly adopted by the Samish Tribal Council during a regular Council meeting held on Saturday, September 21, 2019, at which time a quorum was present by a vote of:

7 FOR, 0 AGAINST, 0 ABSTAIN.

Certified by: 

**Dana M. Matthews**  
**Tribal Council Secretary**

**MAILING ADDRESS: P.O. BOX 217 • ANACORTES, WA 98221**

**LOCATION: 2918 COMMERCIAL AVE • ANACORTES, WA 98221**



**U.S. Department of Housing and Urban Development**  
Northwest Office of Native American Programs  
Federal Office Building  
909 First Avenue, Suite 300, OAPI  
Seattle, WA 98104-1000

November 26, 2019

The Honorable Thomas Wooten  
Tribal Chairman  
Samish Indian Nation  
PO Box 217  
Anacortes, WA 98221-0217

Dear Chairman Wooten:

**SUBJECT:** Federal Fiscal Year 2020  
Indian Housing Block Grant Program  
Grant Number. 55-IT-53-13870

The Office of Native American Programs is pleased to inform you that the Indian Housing Plan (IHP) you submitted for Federal Fiscal Year (FFY) 2020 funding under the Indian Housing Block Grant Program has been found to be in compliance with the requirements of Section 102 of the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA) and the associated requirements at 24 CFR Part 1000.

The regulation at 24 CFR 1000.214 explains that grant funds will be provided to a recipient when two conditions are met: First, the IHP must be determined to be in compliance with Section 102 of NAHASDA and second, funds must be available. As stated above, the first condition has been met (your IHP is in compliance). Unfortunately, at the present time, grant funds for FFY 2020 are not available. Funds for FFY 2020 will not be available until Congress appropriates the funds and makes them available to the Office of Native American Programs. We will notify you as soon as the funds become available.

If you have questions or need assistance during this process, please contact, Sandel Ferguson Grants Management Specialist, at (206) 220-6673, or me at (206) 220-6661.

Sincerely,

A handwritten signature in black ink, appearing to read "David Boyd", written over a horizontal line.

David Boyd  
Director,  
Grants Management Division

**3. Planned program Benefits: Describe below how your planned programs and activities will address the needs of low income families identified above. Also describe how your planned programs will address the various types of housing assistance needs.**

Our program and activities address the needs of low income Native families by offering safe and affordable housing through our Tenant Based Rental Assistance (TBRA) Program, Homelessness Prevention, Emergency Housing (Shelter Stays), Rapid Re-Housing, housing searches, financial management, landlord/tenant education and other supportive services that will help Native families obtain skills that will support their ability to retain long term permanent housing. Through our TBRA program, fifty (50) Native families will be provided with long term assistance and fifty (50) will be supported through our Homelessness Prevention, Rapid Re-Housing and/or Emergency Housing assistance program.

In early 2020, Samish Indian Nation will complete its work with our Rental Design team, and start constructing up to eighteen (18) units of rental housing, in which nine (9) of those units will be designated as affordable permanent housing for our low-income households. The other 9 will be designated for over-income households, financed with Non-Indian Housing Block Grant (IHBG) funding. The land is located at 2109 34<sup>th</sup> Street, Anacortes, Washington 98221.

A Community Center will be constructed to be used by residents of our affordable permanent housing, in addition to families participating in our TBRA, Homelessness Prevention, Rapid Re-housing and Emergency housing programs.

We will introduce a new program "Community Awareness Health and Safety", designed to provide home safety demonstrations, home ownership education, home maintenance skills, educational training, and financial literature to residents in our affordable permanent housing, in addition to families participating in our TBRA, Homelessness Prevention, Rapid Re-housing and Emergency Shelter housing programs.

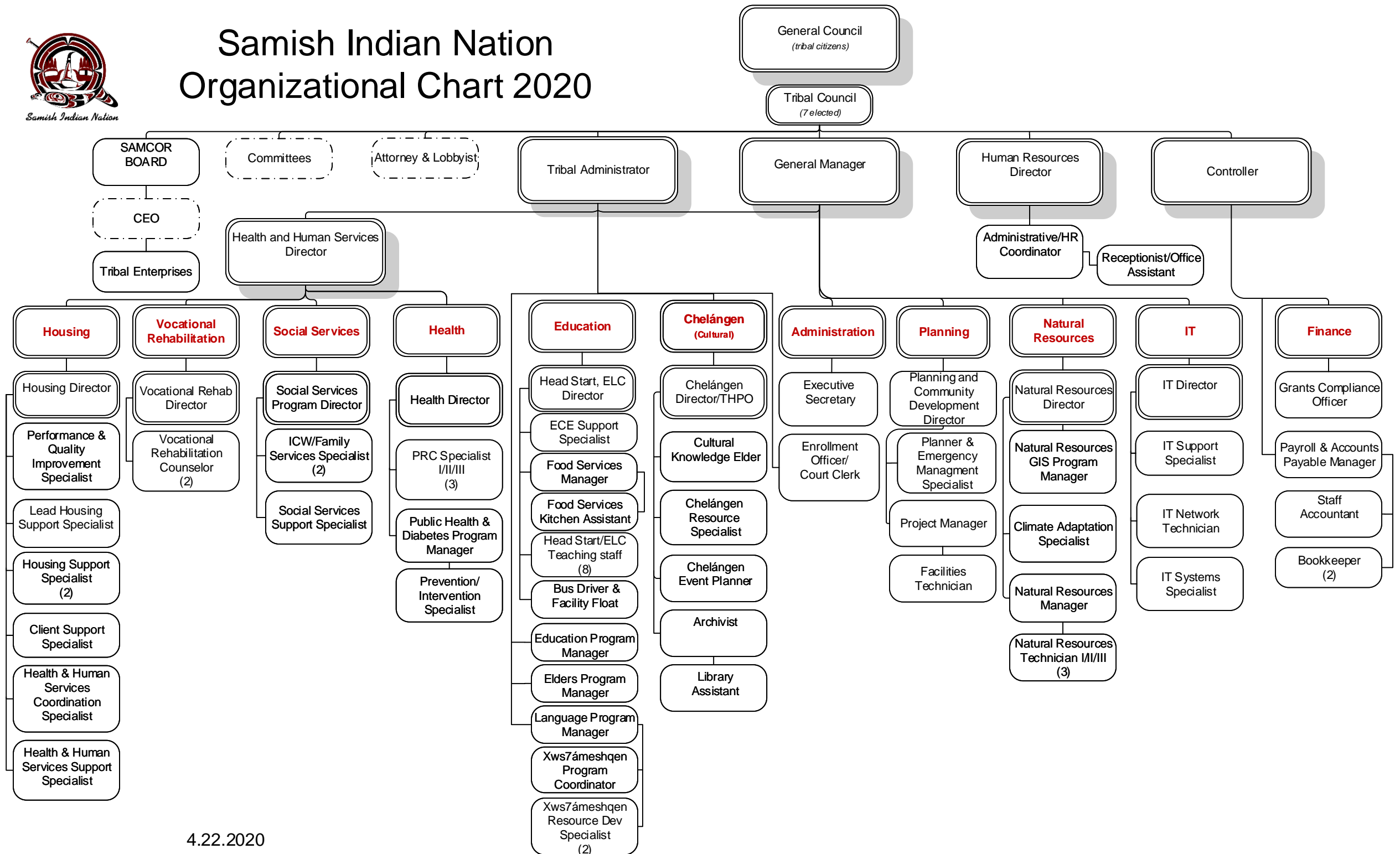
**Activities offered will include** assistance preparing a **housing search plan** and list of local landlords. For those clients that demonstrate that they need more assistance and support to find housing, the supportive service will be provided to meet the level of need. **Evaluate** the household's current resources, problem-solving abilities, and financial life skills, then provide the appropriate amount of assistance to ensure the greatest chance of successful transition to independence after program exit. When assistance ends, participants should have developed a natural support system, if possible, that will allow them to address obstacles that might later arise with employments, childcare, transportation or financial management. Participants will also need to know how to **navigate multiple systems**, so "other housing services" should consist of arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability. Rather than simply making referrals to programs, there will be times that we will need to walk participants through how to access services on their own and ensure that

participants have the skills to access services in the future independently. **Connections to Mainstream Resources** – that are appropriate to addressing barriers to housing retention.

Our clients reside in scattered site-housing throughout ten (10) Counties in Western Washington – Clallam, Island, Jefferson, King, Kitsap, Pierce, San Juan, Skagit, Snohomish and Whatcom. Many of our housing clients live in rural areas and do not have access to public transportation. Because of this, our housing staff make home visits to review housing stability plans, transport clients to medical appointments, work source and other necessary appointments to ensure families will become self-sufficient.



# Samish Indian Nation Organizational Chart 2020



4.22.2020

# Funding Approval/Agreement

Native American Housing Assistance and Self-Determination Act of 1996 (Public Law 104-330)

Title I - Indian Housing Block Grant

Title VI - Federal Guarantees For Financing Tribal Housing Activities

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

DUNs #: 091741637

1. Name of Recipient <b>Samish Indian Nation</b>	3. Recipient's 9-digit Tax Identification No. 910931896	4. Reserved FFY 2020
2. Recipient's Complete Address PO Box 217 Anacortes, WA 98221-0217	5. Program/Grant Number 55-IT-53-13870	6. Amount Approved IHBG <b>\$919,966</b>  Title VI Loan Guarantee

This Grant Agreement between the Department of Housing and Urban Development (HUD) and the above named Recipient is made pursuant to the authority of the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA) (25 U.S.C. 4101 et seq.). The Recipient's submissions for NAHASDA assistance, the NAHASDA statute (as now in effect and as may be amended by Congress), the HUD regulations at 24 CFR Part 1000 (as now in effect and as may be amended from time to time), and this Funding Approval, including any special conditions, constitute the Agreement. Subject to the provisions of this Grant Agreement, HUD will make the funding assistance specified here available to the Recipient upon execution of the Agreement by the parties. The Indian Tribe has agreed to assume all of the responsibilities for environmental review, decision making, and actions as specified and required in regulations issued by the Secretary consistent with and pursuant to Section 105 of NAHASDA. (If the Indian Tribe did not agree to assume these responsibilities, these responsibilities are retained by HUD). The Recipient further acknowledges its responsibility for adherence to the Agreement by entities to which it makes funding assistance hereunder available.

<b>U.S. Department of Housing and Urban Development</b>	<b>Recipient</b>
Name <b>Thomas H. Carney</b>	Name
Signature 	Signature 
Title Administrator	Title
Date 02/18/2020	Date (mm/dd/yyyy) 03/18/20

7. Special conditions (check applicable box) a. <input checked="" type="checkbox"/> Not applicable b. <input type="checkbox"/> See attachment(s)	8a. Date HUD Received Submission 10/02/2019 8b. Date Recipient Notified 02/18/2020 8c. Date of Start of Program Year 01/01/2020	9. (check one) a. <input checked="" type="checkbox"/> Orig. Funding aprvl. b. <input type="checkbox"/> Amendment c. Amendment Number	10. Amount of Indian Housing Block Grant a. Funds Reserved for this Recipient \$919,966 b. Funds Now Being Approved \$919,966 c. Reservation to be Cancelled (a minus b)
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11. (This section is to be completed only if a Tribally Designated Housing Entity (TDHE) is the recipient of the loan guarantee but is not the IHBG recipient)

11a. Name & Address of TDHE

### Loan Guarantee Acceptance Provisions for Tribally Designated Housing Entities (TDHE)

The Tribally Designated Housing Entity hereby accepts the Grant Agreement executed by the Department of Housing and Urban Development (HUD) on the above date with respect to the above program grant number(s) as Recipient designated to receive loan guarantee assistance, and agrees to comply with the terms and conditions of the Agreement, applicable regulations, and other requirements of HUD now or hereafter in effect, pertaining to the assistance provided to it.

11b. Authorized Representative Name Not Applicable  
 Title \_\_\_\_\_  
 Signature \_\_\_\_\_  
 Date (mm/dd/yyyy) \_\_\_\_\_

### HUD Accounting Use Only (show all dates as mm/dd/yyyy)

TAC				Program	Y	A	Reg.	Area	Document No.	Project No.	Category	Amount	Effective Date
1	5	3											
1	7	6											

Date Entered in PAS	Date Entered LOCCS	Batch Number	Transaction Code	Entered by	Verified by
---------------------	--------------------	--------------	------------------	------------	-------------

Resolution 2005-08-008  
Adopted: 8/10/05  
Subject: Conflict of Interest Policy  
Resolution: 2018-05-017  
Revised: 05/19/2018

**SAMISH INDIAN NATION  
CONFLICT OF INTEREST POLICIES AND PROCEDURES  
For Federal Funds Administered By  
U.S. Dept. Of Housing and Urban Development**

**Samish Tribal Code §13.300**

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<b>§ 13.300</b>	<b><a href="#">DEFINITIONS</a></b>	<b>2</b>
<b>§ 13.301</b>	<b><a href="#">PROCUREMENT</a></b>	<b>2</b>
<b>§ 13.302</b>	<b><a href="#">CONFLICT OF INTEREST</a></b>	<b>3</b>
<b>§ 13.303</b>	<b><a href="#">RECORDS RETENTION</a></b>	<b>5</b>
<b>§ 13.304</b>	<b><a href="#">TRIBAL COUNCIL MINUTES/COMMITTEE MINUTES</a></b>	<b>5</b>
<b>§ 13.305</b>	<b><a href="#">VIOLATIONS</a></b>	<b>5</b>

Resolution 2007-06-009  
 Date Adopted: June 9, 2007  
 Resolution: 2009-02-012  
 Revised: February 13, 2009  
 Resolution 2013-05-004  
 Revised: May 3, 2013  
 Resolution: 2013-12-011  
 Revised: December 13, 2013  
 Resolution: 2014-01-009  
 Revised: January 10, 2014  
 Resolution: 2014-05-008  
 Revised: May 2, 2014  
 Revised: October 17, 2014  
 Resolution: 2014-10-013  
 Revised: September 30, 2015  
 Resolution: 2015-09-23  
 Resolution: 2018-11-011

Subject: Housing Programs Policy

**SAMISH INDIAN NATION HOUSING PROGRAMS POLICY**

**Samish Tribal Code §13.200**

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<b>§ 13.200</b>	<b><u>GENERAL PROVISIONS</u></b> a. Adoption b. Interpretation c. Housing Standards	<b>3</b>
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<b>§ 13.202</b>	<b><u>ADMISSIONS</u></b> a. Application b. Eligibility Determination c. Wait List	<b>10</b>
<b>§ 13.203</b>	<b><u>SELECTION PROCESS</u></b> a. Selection b. Order of Selection Exceptions c. Order of Selection Down Payment Assistance	<b>12</b>
<b>§ 13.204</b>	<b><u>DOWN PAYMENT ASSISTANCE</u></b> a. Grant Requirements b. Deed of Trust Requirement c. Emergency Mortgage Assistance	<b>14</b>
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Housing Admissions Policies Adopted 6/9/07-Resolution 2007-06-2009; Revised 2/13/09 Resolution 2009-02-2012; Revised 5/03/13 Resolution 2013-05-004; Revised 12/13/13 Resolution 2013-12-011; Revised 1/10/14 Resolution 2014-01-009; Revised 5/02/14 Resolution 2014-05-008; Revised 10/17/14 Resolution 2014-10-013; Revised 9/30/15 Resolution 2015-09-23; Resolution 2018-11-011



Resolution 2007-06-009  
Date Adopted: June 9, 2007  
Resolution: 2009-02-012  
Revised: February 13, 2009  
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Resolution: 2014-05-008  
Revised: May 2, 2014  
Revised: October 17, 2014  
Resolution: 2014-10-013  
Revised: September 30, 2015  
Resolution: 2015-09-23  
Revised: December 12, 2015  
Resolution: 2015-12-033  
Resolution: 2018-11-011

Subject: Housing Programs Policy

- d. Determination for Repairs Authorized Under Grant
- e. Written Report
- f. Housing Department Responsibilities

**§ 13.206      RENTAL ASSISTANCE      **23****

- a. Payment Assistance
- b. Grant Amount
- c. Ineligible Applications
- d. Emergency Assistance
- e. Other Assistance
- f. Term of Assistance
- g. Rental Deposit Grant
- h. Leases
- i. Non Party to Lease
- j. Payments
- k. Certification
- l. Obligations of Parties
- m. Assistance When Family Breaks Up
- n. Termination of Lease
- o. Termination of Assistance by Housing Department

**§13.207      APPLICANT/TENANTS RIGHT TO APPEAL ADVERSE**  
**DECISION BY HOUSING DEPARTMENT      **37****

**APPENDIX A-----Definitions**

**APPENDIX B ----- Income Guidelines**

**APPENDIX C-----Application forms**

**APPENDIX D----- Housing Quality Standards for Rental Assistance Program**

## 5-04-001 Conduct Policy

- (1) All Tribal Employees and volunteers shall be required to comply with this Conduct Policy, or be subject to disciplinary action.
- (2) *Comply with Applicable Laws.* All employees will comply with the laws, policies, priorities and procedures of the Tribe as well as any other applicable laws.
- (3) *Intimidation.* No employee will use his or her position to threaten, intimidate, harass, or improperly attempt to influence another Employee, tribal official or tribal member.
- (4) *Deviation from Policies.* No employee will deviate from established Tribal policies without written authorization from the Tribal Council.
- (5) *Behavior.* While working, all Employees are expected to conduct themselves in such a manner so as to promote the best interests of the Tribe. Employees who fail to behave in accordance with these expectations may be subject to disciplinary action. Employees will be expected to conform to the following:
  - (a) Complying with all applicable laws including criminal laws, policies, regulations, or procedures.
  - (b) Comply with all Tribal safety and security regulations.
  - (c) Maintain workplace and work area cleanliness and organization.
  - (d) Treat others in a courteous and business like manner.
  - (e) Refrain from conduct or behavior, which is offensive, unprofessional, or contrary to the Tribe's best interests.
  - (f) Report to the Employee's Supervisor behavior, or evidence of behavior, by fellow Employees or others that may be in violation of any applicable laws, ethical obligations, or policies.
- (6) *Criminal Conduct.* If the General Manager has reasonable grounds to believe that an Employee has committed a criminal offense that would be cause for disciplinary action under this Policy, but no conviction, guilty plea or plea has been obtained, the General Manager may suspend the employee with or without pay pending resolution of the criminal matter.
- (7) *Gifts and Favors.* Employees shall not accept any personal favor, service, gift, or other item, exceeding \$50 in value, from any vendor, customer, contractor, individual or firm having or proposing to do business with the Tribe. Gifts of a cultural nature are exempt from this policy. Employees whose positions are funded entirely by grants may be subject to further restrictions based on grant conditions.
- (8) *Conflict of Interest.* No Employee shall make any decision, which would be likely to or will result in a financial benefit or advantage to themselves or their immediate family. A conflict does not exist when an Employee's decision will benefit a class of persons, usually defined in general as three or more persons. A conflict for purposes

of this subsection exists when an Employee participates in a job interview where a qualified applicant is a member of the Employee's immediate family.

(9) *Contract Awards.* No contract for services or goods with the Tribe will be entered into if an Employee or his or her immediate family has any interest in the contracting entity or will receive a financial benefit from the contract, unless the interest has been fully disclosed and the Tribal Council approves prior to final execution of said contract.

(10) *Supervision of Relatives.* No Employee shall directly supervise or be directly supervised by a member of the Employee's immediate family.

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**The Samish Tribal Policies is current through Resolution 2020-04-014, passed April 22, 2020.**

Disclaimer: The nation has the official version of the Samish Tribal Policies. Users should contact the nation for ordinances passed subsequent to the ordinance cited above.

**Note:** This site does not support Internet Explorer. To view this site, Code Publishing Company recommends using one of the following browsers: Google Chrome, Firefox, or Safari.

[Nation Website: www.samishtribe.nsn.us](http://www.samishtribe.nsn.us)

[Code Publishing Company](#)

### Housing Department – Records Retention – 2020

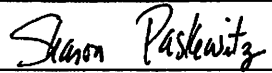
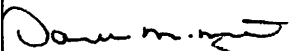

Item #	Series Titles and Description	Location	Retention Period	Office of Record	Remarks
1	<b>Administrative Procedures and Instructions</b>  <b>Housing Policy</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221	Until Obsolete or superseded	Housing	
2	<b>Administrative Working Files</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221	3 Years	Housing	Contact tribal Archivist before disposing
3	<b>Annual Performance Reports</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221  Grants Compliance Office 8327 Summit Park Road, Anacortes 98221	Permanent	Housing	Grants Compliance retains original
4	<b>Background Checks</b>	Human Resources 2918 Commercial Avenue, Anacortes 98221	7 years	Human Resources	
5	<b>Budget Submitted to HUD</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221  Grants Compliance Office 8327 Summit Park Road, Anacortes 98221	Permanent	Housing	Grants Compliance retains original
6	<b>Client Files</b>	Archives 1013 29 <sup>th</sup> Street, Anacortes 98221	End of Contract + 7 Years	Housing	
7	<b>Contracts and Agreements</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221  Grants Compliance Office 8327 Summit Park Road, Anacortes 98221  Administration 2918 Commercial Avenue, Anacortes 98221	End of Contract + 7 Years	Housing	Contract Appraisals & Building Inspections
8	<b>Correspondence</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221	2 Years	Housing	Contact tribal Archivist before disposing
9	<b>Financial Support Documents (Continuing grants)</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221  Grants Compliance Office 8327 Summit Park Road, Anacortes 98221	Permanent	Housing	Federal grants reference Federal Register OMB A102

10	<b>Grant Agreement</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221  Grants Compliance Office 8327 Summit Park Road, Anacortes 98221	Permanent	Housing	Federal grants reference Federal Register OMB A102
11	<b>Grant Application Approved</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221  Grants Compliance Office 8327 Summit Park Road, Anacortes 98221	Permanent	Housing	Federal grants reference Federal Register OMB A102
12	<b>Grant Project Warrants, Checks and Vouchers</b>	Grants Compliance Office 8327 Summit Park Road, Anacortes 98221	Permanent	Housing	
13	<b>HUD Inspection</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221	Close of grant + 3 years	Housing	Contact tribal Archivist before disposing
14	<b>Purchase Orders</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221	3 Years	Housing	
15	<b>Project Reports</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221	Permanent	Housing	Federal grants reference Federal Register OMB A102
16	<b>Training Manual</b>	Housing Department – Cannery Building 715 Seafarers Way, Anacortes 98221	2 Years	Housing	

### Records Retention Approval Form

I have read and reviewed the attached retention schedule and approve as accurate and understand all the information written within the schedule for the Housing Department.

I understand that department staff are responsible for informing the Division Head and Records Manager know when records are to be transferred to records storage, or records are to be destroyed.

Approvals	Printed Name	Signature	Date
Department/ program Director	Sharon Paskewitz		11-05-2019
Division Head	Dana Matthews		11-05-2019
Records Manager	Jason Ticknor		11/7/19



## Samish Indian Nation Right to Appeal

### TIME TO FILE AN APPEAL

- A. An appeal of a Tribal Department's final decision by a tribal member **\*must be received within 30 days from the date the final decision was issued.**
- B. No extensions of time for filing an appeal may be granted by the Board or Tribal Council.

### HOW TO FILE AN APPEAL

- A. A tribal member shall make an appeal of a final decision in writing.
- B. **The written request shall include:**
  - A copy of the final decision;**
  - Detail the reason(s) the tribal member believes the decision of the Tribal Department was in error; and**
  - Include the address and telephone number where the tribal member may be contacted.**
- C. The written request must indicate whether the tribal member desires a hearing before the board. If the tribal member does not request a hearing, the decision of the board will be based solely on the documents submitted by the tribal member and the tribal department.
- D. The written request for an appeal and a hearing (if requested) shall **\*be mailed or delivered to the Tribal Administrative Offices at P.O. Box 217 Anacortes, WA. 98221 and be labeled "Confidential Administrative Appeal"**

## Jenna Burnett

---

**From:** Sharon Paskewitz  
**Sent:** Thursday, September 10, 2020 1:13 PM  
**To:** Jenna Burnett  
**Subject:** FW: Indian Preference



**Sharon Paskewitz** | Housing Director - Samish Indian Nation

PO Box 217, 715 Seafarers Way, Suite 103, Anacortes, WA 98221

Office: 360-726-3366 ext. 3366 | E-mail: [spaskewitz@samishtribe.nsn.us](mailto:spaskewitz@samishtribe.nsn.us)

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---

**From:** Jeff Ritter <[jritter@samishtribe.nsn.us](mailto:jritter@samishtribe.nsn.us)>  
**Sent:** Thursday, September 10, 2020 1:03 PM  
**To:** Sharon Paskewitz <[spaskewitz@samishtribe.nsn.us](mailto:spaskewitz@samishtribe.nsn.us)>  
**Cc:** Christa Goings <[cgoings@samishtribe.nsn.us](mailto:cgoings@samishtribe.nsn.us)>  
**Subject:** RE: Indian Preference

Hi Sharon,

With some quick help from Christa, below is your information requested! I don't know how you want to break up or combine the hire/promotion data, but here it is:

For 2020, did we have any employee complaints

- No

For 2020 how many native Americans did we hire and promote

- 3 permanent hires
- 4 temporary hires

Let me know if you need anything else!

Jeff

---

**From:** Sharon Paskewitz <[spaskewitz@samishtribe.nsn.us](mailto:spaskewitz@samishtribe.nsn.us)>  
**Sent:** Thursday, September 10, 2020 8:12 AM  
**To:** Jeff Ritter <[jritter@samishtribe.nsn.us](mailto:jritter@samishtribe.nsn.us)>; Christa Goings <[cgoings@samishtribe.nsn.us](mailto:cgoings@samishtribe.nsn.us)>  
**Subject:** Fwd: Indian Preference

Hi Jeff



Can you get this information to me today, if possible. Thank you  
Get [Outlook for iOS](#)

---

**From:** Sharon Paskewitz <[spaskewitz@samishtribe.nsn.us](mailto:spaskewitz@samishtribe.nsn.us)>  
**Sent:** Thursday, September 3, 2020 11:42 AM  
**To:** Jeff Ritter  
**Subject:** Indian Preference

Jeff

For 2020, did we have any employee complaints:

For 2020 how many native Americans did we hire and promote

This is for my HUD self-monitoring audit.

Thanks.



**Sharon Paskewitz** | Housing Director - Samish Indian Nation

PO Box 217, 715 Seafarers Way, Suite 103, Anacortes, WA 98221

Office: 360-726-3366 ext. 3366 | E-mail: [spaskewitz@samishtribe.nsn.us](mailto:spaskewitz@samishtribe.nsn.us)

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