

**Whitefish Housing Authority  
Board of Commissioners Regular Monthly Meeting Agenda**

**Date: March 2, 2026**

**Location: Whitefish City Hall**

**Time: 5:30pm**

**I. Call to Order & Roll Call**

**II. Consent Agenda**

A. Approval of Agenda

**III. Continuing Business (Old/Unfinished)**

A. Completion of WHA Corrective Action Plan (Resolution #304, attached)

**IV. Board Training + Onboarding Discussion**

- A. Onboarding Packet Review + Feedback
- B. General Board Training Q&A with Acting Director

**V. Closed Session (if necessary)**

Pursuant to MCA 2-3-203 for legal or personnel discussion, during this meeting, the board may elect to enter a closed-door session for reasons related to legal and/or personnel issues. Per Montana Code Annotated 2-3-203: The presiding officer of any meeting may close the meeting during the time the discussion relates to a matter of individual privacy and then if and only if the presiding officer determines that the demands of individual privacy clearly exceed the merits of public disclosure. The right of individual privacy may be waived by the individual about whom the discussion pertains and, in that event, the meeting must be open.

**VI. Adjourn**

# Whitefish Housing Authority

RESOLUTION No. #304

RESOLUTION AUTHORIZING THE WHITEFISH HOUSING AUTHORITY TO TAKE ALL CORRECTIVE ACTIONS NECESSARY TO COMPLY WITH UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FINDINGS

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**WHEREAS**, the Whitefish Housing Authority (the “Authority”) is a public housing agency created by resolution of the City of Whitefish in 1967 under the statutes and laws of the State of Montana; and

**WHEREAS**, on October 1, 2024, following an audit of the Authority’s books and records, the United States Department of Housing and Urban Development (“HUD”) issued a list of findings to the Authority requiring compliance with HUD regulations applicable to the Authority’s housing programs; and

**WHEREAS**, a list of HUD’s findings which remain out of compliance (the “Findings”) is attached hereto as Exhibit A; and

**WHEREAS**, the Board of Commissioners of the Authority (the “Board”) now wishes to authorize and direct the Authority’s officers, employees and agents to take all actions necessary and advisable to cause compliance with the Findings;

**NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE WHITEFISH HOUSING AUTHORITY** hereby authorizes and directs the Executive Director, and all proper Commissioners, employees, and agents of the Authority to do all things and take all actions necessary to correct the Findings, including, without limitation, the following corrective actions:

1. To develop or amend and adopt policies and procedures for the collection of overpayments, conducting inspections, disposing of equipment, income restrictions, record retention, and reporting criminal violence, together with any other policies and procedures required by HUD to correct the Findings;
2. To solicit, obtain and retain a commercial bank for the provision of certain banking and investment services required by HUD, and in connection therewith, the Board further hereby authorizes and directs the Executive Director and the Board Chair and Vice Chair to be authorized signatories on any and all banking and investment accounts established with the selected commercial bank;
3. To do all such acts and things and to produce, execute, acknowledge, and deliver all such documents, reports and certificates on behalf of the Authority as may be deemed necessary or desirable to correct the Findings, and to carry out and give effect to the terms and intent of this Resolution.

**BE IT FURTHER RESOLVED** that all actions of the Authority, the Board, and the Executive Director that are in conformity with the purposes and intent of this Resolution are hereby ratified, confirmed, and approved.

**BE IT FURTHER RESOLVED** that if any section, paragraph or provision of this Resolution is held to be invalid or unenforceable for any reason, the invalidity or unenforceability of such section, paragraph or provision will not affect any of the remaining provisions of this Resolution.

**BE IT FURTHER RESOLVED** that if resolutions or other actions of the Authority, the Board, or any of the officers, employees or agents of the foregoing, whether written or unwritten that are in effect and are in conflict or inconsistent with the terms of this Resolution, the transactions contemplated herein, are hereby and to such extent repealed and annulled, and this Resolution shall supersede the same.

**BE IT FURTHER RESOLVED** that this resolution shall take effect immediately.

ADOPTED AT THE MONTHLY BOARD OF COMMISSIONERS MEETING OF THE WHITEFISH HOUSING AUTHORITY THIS 2nd Day of March 2026.

Whitefish Housing Authority, Whitefish, Montana

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Katherine Berry, Board Chair, WHA Board of Commissioners

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Marissa Getts, Acting Director

**EXHIBIT A**  
**HUD FINDINGS**

Number	Finding	Regulatory Citation	Corrective Action
7	<p><b>Finding 7:</b> On an annual basis, the Authority does not distribute complete year-end financial statements to the Chairman and to each member of the PHA Board of Commissioners. The Authority has not submitted its June 30, 2023, fiscal year ended, unaudited Financial Data Schedule (FDS). The fee accountant is on track to complete the 2023 FDS by August 2024 as the Authority has resumed sending the accounting software data.</p>	<p><u><a href="#">Regulatory Citation: 24 CFR 990.285</a></u></p>	<p><b>Corrective Action:</b> The Authority must submit their 2023 unaudited and audited FDS. The Authority should submit an extension request for its 2024 unaudited and audited FDS as the fee accountant stated that their 2024 FDS submission will likely be late.</p>
8	<p><b>Finding 8:</b> The Authority does not have a HUD-51999 General Depository Agreement (GDA) on file for the bank accounts that receive HUD Public Housing and Housing Choice Voucher funding.</p>	<p><b>Regulatory Citation:</b> The Annual Contributions Contract (ACC) between Whitefish and HUD requires that the PHA execute and maintain a HUD prescribed GDA form.</p>	<p><b>Corrective Action:</b> The Authority shall execute a HUD-51999 with its depository bank for the accounts that receive HUD Public Housing program and include full account numbers on the form. A copy of the executed HUD-51999 shall be provided to the Field Office.</p>
19	<p><b>Finding 19:</b> HCV Lead-Based Paint: The Authority does not ensure landlords understand requirements for Lead Safe Housing Rule compliance, including responding to children with Elevated Blood Lead Levels (EBLL) and obtaining clearance after performing hazard control and before occupancy.</p>	<p><u><a href="#">Regulatory Citation: 24 CFR 35.1200-1355</a></u></p>	<p><b>Corrective Action:</b> The Authority shall document its compliance with Lead Based Paint requirements for the HCV program required by 24 CFR 35, PIH Notice 2017-13, and outlined in the Authority's Section 8 Admin plan. The Authority must provide documentation that landlords and new tenants receive the Lead Based Paint disclosure and the EPA lead information packet.</p>
23	<p><b>Finding 23:</b> The Authority is not providing required information to HCV applicants at briefings.</p>	<p><u><a href="#">Regulatory Citation: 24 CFR 982.301</a></u></p>	<p><b>Corrective Action:</b> The Authority must conduct an oral briefing and provide an information packet containing all the items in 24 CFR 982.301. Provide a copy of your briefing packet to the Field Office.</p>

25	<b>Finding 25:</b> HCV supervisory inspections are not conducted on units under lease.	<a href="#">Regulatory Citation: 24 CFR 985.3(e)</a>	<b>Corrective Action:</b> The Authority must develop a policy for conducting supervisory quality control inspections. Provide a copy to the Field Office.
32	<b>Finding 32:</b> The Authority has not developed and implemented an inventory control system and schedule for equipment and similar assets.	<b>Regulatory Citation:</b> 24 CFR 905.308(a); 2 CFR 200.313(d)(3)	<b>Corrective Action:</b> The Authority must provide HUD with a copy of the equipment inventory and disposition policy that complies with the requirements of 2 CFR 200.313
33	<b>Finding 33:</b> The Authority does not complete physical inventories and inventory reconciliations of its property at least every two years.	<b>Regulatory Citation:</b> 24 CFR 905.308(a); 2 CFR 200.313(d)(2)	<b>Corrective Action:</b> The Authority must provide HUD with a copy of the equipment inventory and disposition policy that complies with the requirements of 2 CFR 200.313
36	<b>Finding 36:</b> The Authority has not implemented the Housing Opportunity through Modernization Act (HOTMA) over-income restriction as detailed in PIH Notice 2023-03.	<a href="#">Regulatory Citation: PIH Notice 2023-03(7)</a>	<b>Corrective Action:</b> The Authority must update their ACOP to conform to the HOTMA over-income restriction. Provide a copy of the policy to the field office.
40	<b>Finding 40:</b> Payroll records do not confirm that maintenance wage rates are paid in accordance with HUD-determined rates. The Authority missed the March 2024 semi-annual Davis-Bacon Labor Standards reporting.	<a href="#">Regulatory Citation: 24 CFR 905.308 (b)(3)</a>	<b>Corrective Action:</b> HUD Labor Standards staff now has the new ED's email on file. They will begin sending her notifications. The next semi-annual Davis-Bacon Labor Standards reporting is in October 2024.

42	<p><b>Finding 42:</b> The Authority has no documentation of required Section 3 reports</p>	<p><u>Regulatory Citation: 24 CFR 75.31(a).31(a)</u></p>	<p>Corrective Action: 24 CFR 75.31 states that HUD shall have access to all records, reports, and other documents or items of the recipient that are maintained to demonstrate compliance with the requirements of this part, or that are maintained in accordance with the regulations governing the specific HUD program by which the Section 3 project is governed, or the public housing financial assistance is provided or otherwise made available to the recipient, subrecipient, contractor, or subcontractor. The Authority must retain on-site records to demonstrate compliance with Section 3 regulations.</p>
45	<p><b>Finding 45:</b> The Authority has not updated its VAWA policies in the ACOP to align with the most recent regulations and PIH Notice 2017-08.</p>	<p><b>Regulatory Citation:</b> Notice PIH-2017-08 , 34 U.S.C. 12491and 24 CFR § 982.54 establishes the requirements to be followed to ensure the objectives of VAWA are met.</p>	<p><b>Corrective Action:</b> The Authority must update the ACOP and provide a copy to HUD once completed.</p>
46	<p><b>Finding 46:</b> The Authority does not keep all information related to domestic violence, dating violence, sexual assault, or stalking, including that an individual is a victim, confidential.</p>	<p><u>Regulatory Citation: 24 CFR § 5.2007 (c )</u></p>	<p><b>Corrective Action:</b> The Authority must ensure that all documentation related to instances of VAWA are kept separate from the tenant file and held securely. The Authority must provide HUD with a detailed explanation of how it will maintain files confidential.</p>

50	<p><b>Finding 50:</b> The Authority does not have emergency transfer policies relating to VAWA in its ACOP. An emergency transfer plan requires a PHA to include the following requirements in the Corrective Action:</p>	<p><u>Regulatory Citation: 24CFR §5.2005(e)</u></p>	<p>Corrective Action: The Authority must update its ACOP to include information cited in 24CFR §5.2005(e) and provide a copy to HUD:</p> <ul style="list-style-type: none"> <li>oPHA must describe reasonable efforts to assist a tenant who wants to make an external emergency transfer. 24 CFR§ 5.2005(e)(7)</li> <li>oLanguage which states that the Authority allows a tenant to make an internal emergency transfer when a safe unit is immediately available. 24 CFR § 5.2005 (e)(5)</li> <li>oLanguage which explains if documentation from a tenant seeking an emergency transfer is required. 24 CFR § 5.2005(e)(10)</li> <li>oLanguage which explains if it is required documentation limited to a written request certifying that the tenant requests this transfer, and they meet the criteria in 24 CFR § 5.2005(e)(2)(ii) .</li> <li>24 CFR § 5.2005(e)(10)(ii)</li> <li>oLanguage which explains if the emergency transfer request is available on demand and this information should be publicly available. 24 CFR § 5.2005(e)(11)</li> </ul>
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