

State of Montana

2009 ANNUAL ACTION PLAN

EXECUTIVE SUMMARY



Governor Brian Schweitzer

Investing in Montana's Communities

DEPARTMENT OF COMMERCE

Anthony Preite, Director

Community Development Block Grant Program

Home Investment Partnerships Program

DEPARTMENT OF PUBLIC HEALTH & HUMAN SERVICES

Anna Whiting Sorrell, Director

Emergency Shelter Grant Program

For the Plan Year
April 1, 2009
through
March 31, 2010

As approved by:
U.S. Department of
Housing & Urban
Development

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2009 ANNUAL ACTION PLAN

EXECUTIVE SUMMARY

INTRODUCTION

This Executive Summary is being provided pursuant to the March 13, 2006 revisions to the Consolidated Plan regulations (24 CFR part 91). Those regulations require that an Executive Summary be prepared and must include:

- A summary of the citizen participation and consultation process;
- Objectives and outcomes and an evaluation of past performance; and
- Summary of comments on the plan and responses to comments.

The Montana Department of Commerce (MDOC) is the lead agency overseeing the development of the Consolidated Plan. This Annual Action Plan is for the 12-month period beginning April 1, 2009 and ending March 31, 2010 (federal fiscal year 2009) and is designed to meet the requirements set forth by the U.S. Department of Housing and Urban Development (HUD). Each year, Montana submits an action plan illustrating how the HUD Community Planning and Development (CPD) resources it receives will be utilized to improve communities throughout the state. Information on Montana's Consolidated Plan can be accessed at http://housing.mt.gov/Hous_CP.asp.

The Annual Action Plan, developed with the input of citizens and community groups, serves as the state's application for funds available through the three HUD formula grant programs that are administered by the state of Montana:

- The Community Development Block Grant (CDBG) Program, administered by the Community Development and Business Resources Divisions of the MDOC;
- The HOME Investment Partnerships (HOME) Program, administered by the Housing Division of the MDOC; and
- The Emergency Shelter Grant (ESG) Program, administered by the Human and Community Services Division of the Montana Department of Public Health and Human Services (MDPHHS).

| FFY 2009 Funds | Formula Grant Program |
|---------------------------|--|
| \$ 6,861,827 | Community Development Block Grant Program |
| \$ 4,715,298 | Home Investment Partnerships Program |
| \$ 0 | American Dream Downpayment Initiative ¹ |
| \$ 400,013 | Emergency Shelter Grant Program |
| \$11,977,138 | Totals |

¹ American Dream Downpayment Initiative was not funded in FFY2009

This Action Plan includes information about the overall goals and objectives for the coming year with a description of the available resources and proposed actions to address identified needs. In addition, it includes information about the specific activities and allocation of resources available for the three federal block grant programs covered by Montana's Consolidated Plan.

The state's overall goals include:

- Increasing the supply of decent, safe, sanitary, affordable housing, especially for low- and very low-income families, individuals, and special needs populations such as the elderly, disabled and homeless;
- Expanding economic opportunities in order to improve the living conditions for low- and moderate-income groups;
- Expanding and improving community facilities and services, principally for low- and moderate-income persons, which are essential for sound community development and for development of viable communities; and
- Preventing homelessness through direct services and by providing resources to shelters to maintain facilities.

The primary objective of the **CDBG Program** is to develop viable communities by providing decent housing; providing a suitable living environment; and expanding economic opportunities that principally benefit low- and moderate-income (LMI) persons (persons at or below 80 percent of the area median income). The CDBG Program will assist communities to expand affordable housing and economic opportunities, provide infrastructure, and improve public facilities. With the participation of its citizens, communities can devote funds to a wide range of activities that best serve their own particular community development needs and priorities.

The purpose of the **HOME Program** is to expand the supply of affordable housing for low- and very low-income households (persons at or below 80 percent of the area median income). The HOME Program distributes funds to communities and nonprofit community housing development organizations (CHDOs) around the state for acquisition, rental rehabilitation, new construction of multi- and single-family housing, tenant based rental assistance, homeowner rehabilitation, and homebuyer assistance.

ESG funds are distributed to Montana's 10 Human Resource Development Councils (HRDC). The HRDCs use the funds at the local level to meet the needs of the homeless or those at risk of becoming homeless.

SUMMARY OF CONSOLIDATED PLAN REVISIONS FOR 2009

The revisions that are included in the Consolidated Plan 2009 Annual Action Plan are summarized below.

Community Development Block Grant Program

- The Business Resources Division did not have any significant changes for the CDBG Economic Development Program for plan year 2009.
- The Community Development Division (CDD), CDBG Housing and Public Facilities, increased the ceiling for Planning Grants, from \$15,000 to \$20,000.
- In addition, the CDD added that unallocated funds from the current fiscal year or unexpended or uncommitted funds from the previous grant awards for Housing, Public Facilities, or Planning projects may be reallocated to other CDBG-eligible projects at the discretion of the MDOC Director, to best achieve the stated objectives of the Montana CDBG Program.

Home Investment Partnerships Program

For plan year 2009, the HOME Program made several changes to its competitive application process and to the Single Family Allocation Pilot Program (now known as the Single Family Noncompetitive Program). For a full description of these changes, see the Annual Action Plan, available online at:

<http://housing.mt.gov/includes/cp/applicationdocs/cp-aap-09.pdf>

➤ Competitive Applications

- The HOME Program did not receive a sufficient number of applications to fully award its 2008 competitive funds. Normally, when the program does not award all its funds for a given program year, a second round of competition is held and the competition is opened up to entitlement cities (Billings, Great Falls, and Missoula) and the other qualified applicants operating within those cities' boundaries. However, a second round of competition was not held for the unallocated 2008 competitive funds; instead, those funds were rolled into the 2009 grant competition. Therefore, the 2009 competition is open to the entitlement cities and the MDOC-certified community housing development organizations (CHDOs) and public housing authorities (PHAs) operating within those cities this one time only.
- The HOME Program modified the spend down requirements for applicants that have an open, previously awarded HOME grant. The program relaxed the requirements by reducing the spend down for open grants from 75% to 50% for one-year-old grants and from 100% to 75% for two-year-old grants. Grants three years and older must be 100% spent down and conditionally closed.
- The HOME Program is allowing a CHDO to submit multiple applications **as long as each application is from a different county within its service area and each application is for a CHDO-eligible activity.**

➤ **Single Family Noncompetitive Program**

- The annual allocation to the Single Family Noncompetitive Program (SFNP) was reduced from one-half of the annual allocation received from HUD to one-third of the annual allocation. The allocation to the SFNP for 2009 is \$1,178,824.
- The length of time SFNP funds are available in the statewide pool is now limited to six (6) months, rather than indefinitely. At the end of the six-month period, any unobligated funds will be reallocated to the next **competitive grant application pool**.
- The number of districts among which the SFNP funds are allocated was reduced to four (from the current 11), in addition to the statewide District 1.
- The formula used to allocate funds among the four districts now includes a factor for the commitment of two prior years' funds (2006 and 2007).
- Beginning with the 2009 funds, a period of affordability for owner-occupied rehabilitation projects based upon the amount of home funds invested is required. The period of affordability mirrors the requirements for homebuyer assistance.

Emergency Shelter Grant Program

No significant changes were proposed for plan year 2009.

OBJECTIVES AND OUTCOMES

HUD has established a performance outcome measurement system for its programs. The MDOC and MDPHHS have adopted the framework of HUD's outcome measurement system as the foundation for establishing performance measures and outcomes for each of the three HUD formula grant programs covered by this plan.

Montana's HUD-funded formula grant programs fund a variety of activities. For the purposes of the performance management system, each activity is assigned to one of three **objective categories** that best illustrates the purpose and intent of the activity. The three objectives are:

- **Suitable Living Environment**: In general, this objective relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment.
- **Decent Housing**: The activities that typically would be found under this objective are designed to cover the wide range of housing possible under HOME, CDBG, or ESG. This objective focuses on housing programs where the purpose of the program is to meet individual family or community needs and not programs where housing is an element of a larger effort, since such programs would be more appropriately reported under Suitable Living Environment.
- **Creating Economic Opportunities**: This objective applies to the types of activities related to economic development, commercial revitalization, or job creation.

Similarly, once the objective for the activity is determined, one of three **outcome categories** is selected that best reflects what will be achieved by funding the activity. The three outcome categories are:

- **Availability/Accessibility:** This outcome category applies to activities that make services, infrastructure, public services, public facilities, housing, or shelter available or accessible to low- and moderate-income people, including persons with disabilities. In this category, accessibility does not refer only to physical barriers, but also to making the affordable basics of daily living available and accessible to low- and moderate-income people where they live.
- **Affordability:** This outcome category applies to activities that provide affordability in a variety of ways in the lives of low- and moderate-income people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups, or services such as transportation or day care.
- **Sustainability - Promoting Livable or Viable Communities:** This outcome applies to projects where the activity or activities are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low- and moderate-income or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

Each outcome category can be connected to each of the overarching objectives, resulting in nine groups of **outcome/objective statements** under which to report the activity or project data to document the results of the activities or projects. Each activity will provide one of the following statements, although sometimes an adjective such as new, improved, or corrective may be appropriate to refine the outcome statement.

| | <u>Outcome 1:</u> Availability or Accessibility | <u>Outcome 2:</u> Affordability | <u>Outcome 3:</u> Sustainability |
|---|---|--|---|
| <u>Objective 1:</u> Suitable Living Environment | Enhance Suitable Living Environment through Improved Accessibility (SL-1) | Enhance Suitable Living Environment through Improved or New Affordability (SL-2) | Enhance Suitable Living Environment through Improved or New Sustainability (SL-3) |
| <u>Objective 2:</u> Decent Housing | Create Decent Housing with Improved or New Availability (DH-1) | Create Decent Housing with Improved or New Affordability (DH-2) | Create Decent Housing With Improved or New Sustainability (DH-3) |
| <u>Objective 3:</u> Economic Opportunities | Provide Economic Opportunity through Improved or New Accessibility (EO-1) | Provide Economic Opportunity through Improved or New Affordability (EO-2) | Provide Economic Opportunity through Improved or New Sustainability (EO-3) |

Each program, project, and activity funded by the three formula grant programs covered by the Annual Action Plan will meet the requirements of the framework.

It should be noted that the federal HUD funding has been declining for several years, while during the same timeframe, costs have continued to escalate due to a variety of

factors. In such an environment, it becomes increasingly difficult to attempt to measure performance in light of long-term production goals, because the factors and assumptions the goals are based upon simply are not stable or constant over time. However, the performance measures and indicators still have value in that they illustrate the nature and extent of the impacts of the state's HUD-assisted programs on Montana's communities and residents.

**Table 3A - Summary of Specific Annual Objectives
Plan Year 2009**

| Specific Obj. # | Outcome/Objective | Sources of Funds | Performance Indicators | Program Year | Expected Number ^{2,3} | Actual Number ⁴ | Percent Completed |
|-----------------|---|---|---|--------------|--------------------------------|----------------------------|-------------------|
| | Specific Annual Objectives | | | | | | |
| DH-1 | Availability/Accessibility of Decent Housing | | | | | | |
| DH-1.1 | Enhance the availability / accessibility of decent housing by offering assistance for the acquisition/new construction of rental and homeownership units for LMI households | CDBG ⁵ | <ul style="list-style-type: none"> • Number of units acquired/newly constructed | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 0 | N/A |
| | | | | 2007 | 0 | 0 | |
| | | | | 2008 | 6 | | |
| | | | | 2009 | 4 | | |
| GOAL | | | | 10 | 0 | | |
| DH-2 | Affordability of Decent Housing | | | | | | |
| DH-2.1 | Address the need for affordable decent housing by offering rehabilitation assistance to low- and very low-income homeowner households | HOME ⁶ Local Match: 5% <i>minimum required</i> | <ul style="list-style-type: none"> • Number of units rehabilitated <ul style="list-style-type: none"> ▪ # of units meeting Section 504 standards ▪ # of units qualified as Energy Star | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 41 | N/A |
| | | | | 2007 | 40 | 18 | |
| | | | | 2008 | 32 | | |
| | | | | 2009 | 25 | | |
| GOAL | | | | 97 | 59 | | |

² Since HOME and CDBG grant funds are primarily distributed through competitive and/or first-come, first-serve processes, the state cannot accurately predict the number of and distribution of grant assistance among specific objectives. The specific number of households, businesses, etc., expected to be assisted each program year is based on the historic number assisted in previous years, adjusted for anticipated declines in funding and rising costs, which may or may not be an accurate reflection of future fund distributions.

³ Use of the performance measurement system was not required at the time the FFY 2006 Action Plan was submitted to HUD; consequently, there is no "Expected Number" for any of the Objectives and Indicators for FFY 2006.

⁴ Reporting of the data in IDIS necessary to complete this form did not become mandatory until October 1, 2006, six months into the plan year; therefore, the "Actual Number" reported does not represent a full year of data.

⁵ Source: IDIS Report CO4PR83, CDBG Performance Measures Report for Program Years 2006 & 2007

⁶ Source: IDIS Report CO4PR23, Program Year 2006 Summary of Accomplishments. Note: No report similar to the CO4PR83, CDBG Performance Measures Report, or CO4PR81, ESG Performance Measures Report, could be found in IDIS for the HOME Program; therefore, detail for the Performance Indicators could not be summarized for the purposes of this report.

| Specific Obj. # | Outcome/Objective | Sources of Funds | Performance Indicators | Program Year | Expected Number ^{2,3} | Actual Number ⁴ | Percent Completed |
|-----------------|---|---|--|--------------|--------------------------------|----------------------------|-------------------|
| | Specific Annual Objectives | | | | | | |
| DH-2.2 | Address the need for affordable decent housing by offering down payment and closing cost assistance to low- and very low-income households | HOME Local match: 5% min. required | <ul style="list-style-type: none"> • Number of households receiving homebuyer assistance <ul style="list-style-type: none"> ▪ # of first-time homebuyers ▪ # receiving homebuyer education/counseling ▪ # coming from subsidized housing | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 111 | N/A |
| | | | | 2007 | 110 | 90 | |
| | | | | 2008 | 88 | | |
| | | | | 2009 | 70 | | |
| GOAL | | | | 268 | 201 | | |
| DH-2.3 | Address the need for affordable decent housing by offering tenant-based rental assistance (TBRA) to low- and very low-income households | HOME Local Match: 5% min. required | <ul style="list-style-type: none"> • Number of households provided with rental assistance <ul style="list-style-type: none"> ▪ # designated for the homeless <ul style="list-style-type: none"> • # for the chronically homeless | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 51 | N/A |
| | | | | 2007 | 55 | 51 | |
| | | | | 2008 | 44 | | |
| | | | | 2009 | 35 | | |
| GOAL | | | | 134 | 102 | | |
| DH-2.4 | Address the need for affordable decent housing by offering assistance for the acquisition, rehabilitation and new construction of rental housing to serve low- and very low-income households | HOME Local Match: 5% min. required | <ul style="list-style-type: none"> • Number of rental units assisted <ul style="list-style-type: none"> ▪ # of units meeting Section 504 standards ▪ # of units qualified as Energy Star ▪ # designated for persons with HIV/AIDS <ul style="list-style-type: none"> • # for the chronically homeless ▪ # designated for the homeless <ul style="list-style-type: none"> • # for the chronically homeless | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 122 | N/A |
| | | | | 2007 | 135 | 78 | |
| | | | | 2008 | 108 | | |
| | | | | 2009 | 86 | | |
| GOAL | | | | 329 | 200 | | |
| DH-2.5 | Address the need for affordable decent housing by offering down payment and closing cost assistance to low- and moderate-income households | CDBG | <ul style="list-style-type: none"> ▪ Number of households receiving homebuyer assistance | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 0 | N/A |
| | | | | 2007 | 0 | 12 | |
| | | | | 2008 | 0 | | |
| | | | | 2009 | 0 | | |
| GOAL | | | | 0 | 12 | | |

| Specific Obj. # | Outcome/Objective | Sources of Funds | Performance Indicators | Program Year | Expected Number ^{2,3} | Actual Number ⁴ | Percent Completed |
|---|---|------------------|--|--------------|--------------------------------|----------------------------|-------------------|
| | Specific Annual Objectives | | | | | | |
| DH-2.6 | Address the need of families facing the possibility of homelessness by providing one-time payments for utilities, rent, or deposits through homeless prevention programs and services | ESG ⁷ | <ul style="list-style-type: none"> Number of individuals receiving 1-time payments for utilities, rent, or deposits for families facing eviction/shut-off or foreclosure or to provide security deposits to enable families to move into a dwelling of their own. | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 0 | N/A |
| | | | | 2007 | 5,060 | 0 | |
| | | | | 2008 | 5,000 | 0 | |
| | | | | 2009 | 5,000 | | |
| GOAL | | | | | 15,060 | 0 | |
| DH-3 Sustainability of Decent Housing | | | | | | | |
| DH-3.1 | Improve the sustainability of decent housing through the rehabilitation of homeowner and rental units to benefit LMI households. | CDBG | <ul style="list-style-type: none"> Number of LMI households assisted | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 59 | N/A |
| | | | | 2007 | 48 | 87 | |
| | | | | 2008 | 39 | | |
| | | | | 2009 | 31 | | |
| GOAL | | | | | 118 | 146 | |
| SL-1 Availability/Accessibility of Suitable Living Environment | | | | | | | |
| SL-1.1 | Enhance the availability / accessibility of suitable living environments through the new construction of public facilities to benefit a geographic area with an LMI percentage of 51% or higher | CDBG | <ul style="list-style-type: none"> Number of persons with new access to the public facility or receiving a service provided by the public facility that is no longer substandard | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 0 | N/A |
| | | | | 2007 | 2,813 | 690 | |
| | | | | 2008 | 1,430 | | |
| | | | | 2009 | 1,144 | | |
| GOAL | | | | | 5,387 | 690 | |
| SL-1.2 | Enhance suitable living environment through availability and accessibility of essential services for the homeless | ESG | <ul style="list-style-type: none"> Number of individuals assisted with essential services such as shelter, food and individual support services | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 0 | N/A |
| | | | | 2007 | 693 | 0 | |
| | | | | 2008 | 690 | | |
| | | | | 2009 | 690 | | |
| GOAL | | | | | 2,073 | 0 | |

⁷ Source: IDIS Report CO4PR81, ESG Performance Measures Report

| Specific Obj. # | Outcome/Objective | Sources of Funds | Performance Indicators | Program Year | Expected Number ^{2,3} | Actual Number ⁴ | Percent Completed |
|-----------------|---|------------------|---|--------------|--------------------------------|----------------------------|-------------------|
| | Specific Annual Objectives | | | | | | |
| SL-1.3 | Enhance the availability/accessibility of a suitable living environment by offering new construction and rehabilitation of non-rental shelters ⁸ to LMI households | CDBG | <ul style="list-style-type: none"> Number of units constructed and rehabilitated | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 0 | N/A |
| | | | | 2007 | 0 | 0 | |
| | | | | 2008 | 3 | | |
| | | | | 2009 | 2 | | |
| GOAL | | | | | 5 | 0 | |
| SL-2 | Affordability of Suitable Living Environment | | | | | | |
| SL-2.1 | Improve the sustainability of the suitable living environment through rehabilitation of existing public facilities ⁹ by targeting direct benefits to serve a specific LMI clientele. | CDBG | <ul style="list-style-type: none"> Number of persons with improved or new access to the public facility or receiving a service provided by the public facility that is no longer substandard | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 0 | N/A |
| | | | | 2007 | 693 | 0 | |
| | | | | 2008 | 690 | | |
| | | | | 2009 | 690 | | |
| GOAL | | | | | 2,073 | 0 | |
| SL-3 | Sustainability of Suitable Living Environment | | | | | | |
| SL-3.1 | Improve the sustainability of suitable living environments through rehabilitation of existing public facilities ¹⁰ to benefit a geographic area with an LMI percentage of 51% or higher. | CDBG | <ul style="list-style-type: none"> Number of persons with improved access to the public facility or receiving a service provided by the public facility that is no longer substandard | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 2,563 | N/A |
| | | | | 2007 | 563 | 4,869 | |
| | | | | 2008 | 722 | | |
| | | | | 2009 | 578 | | |
| GOAL | | | | | 1,863 | 7,432 | |
| SL-3.2 | Address the need for a suitable living environment by supporting existing facilities providing services as emergency shelters and domestic violence facilities as shelter maintenance programs | ESG | <ul style="list-style-type: none"> Number of emergency shelters/domestic violence facilities assisted that provide shelter, food and individual support services through Shelter Maintenance funding <ul style="list-style-type: none"> Number of individuals assisted | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 0 | N/A |
| | | | | 2007 | 23 | 0 | |
| | | | | 2008 | 23 | 0 | |
| | | | | 2009 | 23 | | |
| GOAL | | | | | 69 | 0 | |

⁸ Youth group homes, domestic violence facilities, mental health facilities, homeless shelters, etc.

⁹ Water and wastewater projects, nursing homes, Head Start centers, senior centers, county hospitals, etc.

¹⁰ Water and wastewater projects

| Specific Obj. # | Outcome/Objective | Sources of Funds | Performance Indicators | Program Year | Expected Number ^{2,3} | Actual Number ⁴ | Percent Completed |
|-----------------|---|------------------|---|--------------|--------------------------------|----------------------------|-------------------|
| | Specific Annual Objectives | | | | | | |
| EO-1 | Availability/Accessibility of Economic Opportunity | | | | | | |
| EO-1.1 | Provide economic opportunity through improved or new availability/accessibility | CDBG | <ul style="list-style-type: none"> • Number of loans/grants <ul style="list-style-type: none"> ▪ <i>Number of new businesses assisted</i> ▪ <i>Number of existing businesses assisted</i> ▪ <i>Number of jobs created</i> ▪ <i>Number of jobs retained</i> | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 1 | N/A |
| | | | | 2007 | 0 | | |
| | | | | 2008 | 0 | | |
| | | | | 2009 | 0 | | |
| GOAL | | | | 0 | 1 | | |
| EO-2 | Affordability of Economic Opportunity | | | | | | |
| EO-2.1 | Provide economic opportunity through improved or new affordability | CDBG | <ul style="list-style-type: none"> • Number of loans/grants <ul style="list-style-type: none"> ▪ <i>Number of new businesses assisted</i> ▪ <i>Number of existing businesses assisted</i> ▪ <i>Number of jobs created</i> ▪ <i>Number of jobs retained</i> | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 3 | N/A |
| | | | | 2007 | 4 | 4 | |
| | | | | 2008 | 4 | | |
| | | | | 2009 | 4 | | |
| GOAL | | | | 12 | 7 | | |
| EO-3 | Sustainability of Economic Opportunity | | | | | | |
| EO-3.1 | Provide economic opportunity through improved or new sustainability | CDBG | <ul style="list-style-type: none"> • Number of loans/grants <ul style="list-style-type: none"> ▪ <i>Number of new businesses assisted</i> ▪ <i>Number of existing businesses assisted</i> ▪ <i>Number of jobs created</i> ▪ <i>Number of jobs retained</i> | 2005 | N/A | N/A | N/A |
| | | | | 2006 | N/A | 2 | N/A |
| | | | | 2007 | 4 | 6 | |
| | | | | 2008 | 4 | | |
| | | | | 2009 | 4 | | |
| GOAL | | | | 12 | 8 | | |

EVALUATION OF PAST PERFORMANCE

Plan year 2007 was the first year the state implemented HUD's framework for the outcome measurement system. The state linked appropriate goals and objectives, identified the applicable outcome statement, collected data on performance indicators for each funded activity, and reports performance in the annual performance report for each plan year at the end of each year (March 31).

In June 2006, the MDOC **HOME** Program began requesting that its current grantees use revised set-up and completion reports that include new data fields for the outcome measurement system. As of October 1, 2006, all HOME grantees were required to use the revised set-up and completion reports with the additional data fields.

Beginning October 1, 2006, the MDOC **CDBG** Program began the transition to a new, revised setup and completion report for grantees to provide information for the outcome performance measurement system.

The MDPHHS **Emergency Shelter Grant** Program began collecting the expanded data fields in April 2006 through reporting requirements to match the IDIS system data elements. Additionally, the MDPHHS has been implementing the Homeless Management Information System (HMIS) in Montana. HMIS is used by ESG grantees to collect information regarding individuals participating in the program, improving data collection and enabling the ESG Program to report the actual results.

To the extent possible given the limited timeframe in which data was collected, the state reported performance in the annual performance report for plan year 2006, which ended March 31, 2007. The annual performance report for each plan year is available on the web at: http://housing.mt.gov/Hous_CP_Apps.asp. Plan year 2007, the first full year for which data was collected.

CITIZEN PARTICIPATION SUMMARY

Montana's Citizen Participation Plan, found in Appendix A to the Annual Action Plan, lays out the general guidelines around which the Consolidated Plan was developed and outlines methods for citizens to guide and assist the state in formulating the plan. The objective of the Citizen Participation Plan is to ensure that Montana citizens are given the opportunity to and are encouraged to participate in planning for and preparing the Five-Year Consolidated Plan, the Annual Action Plans, including amendments to the plan, and the Consolidated Annual Performance and Evaluation Reports. All interested parties are urged to participate, but a special emphasis is placed on participation by the following groups:

- low- and moderate-income persons;
- low-income households living in slum and blight areas;
- units of local government;

- statewide and regional institutions and other organizations, including businesses, developers, and community and faith-based organizations;
- public and private agencies that provide assisted housing, health services, and social services; and
- public housing agencies.

The Consolidated Plan is developed through public input solicited at meetings throughout the state. Two meetings occurred before development of the draft report, thereby collecting distinct issue input and aiding policy formation. Notification of all the meetings was made in advance of the meetings through display advertisements in major newspapers around the state, mailed notices and personal invitation letters, e-mail notices, and postings on the state's e-calendar and Consolidated Plan website. The state also provided a public comment period from May through July 3 to solicit input on developing the Annual Action Plan.

The meetings were scheduled to encourage participation by as many groups and individuals as possible. The first meeting was held during the lunch hour. The second meeting, held in conjunction with the statewide housing conference, was held at 7:30 in the morning. The times were set to encourage low- and moderate-income residents, citizens, and organizations whose primary job may not be directly related to creating such a plan and who may otherwise be unable to attend meetings due to work conflicts. Food was provided for attendees to further encourage attendance and participation.

An additional comment period, from mid-October to December 31, was provided after release of the draft Annual Action Plan. Comments received through three public review meetings and written comments, were addressed, as appropriate, and considered for incorporation into the 2009 Action Plan.