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Governor
Steve Bullock



State of Montana 2014 Consolidated Annual Performance and Evaluation Report

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TABLE OF CONTENTS

PART I - CONSOLIDATED ANNUAL PERFORMANCE REPORT5

SECTION A - RESOURCES MADE AVAILABLE TO THE STATE 5

I.A.1 FEDERAL SOURCE - STATE ADMINISTRATION.....5

Montana Department of Commerce5

Community Development Block Grant Program 5

Neighborhood Stabilization Program (NSP)..... 6

Home Investment Partnerships (HOME) Program..... 6

Low Income Housing Tax Credit (LIHTC) Program 6

Section 8 Housing Assistance Programs..... 7

HUD-Veterans Affairs Supportive Housing (VASH) Voucher Program 7

Montana Department of Public Health and Human Services (MDPHHS)..... 8

Emergency Solutions Grant (ESG) Program 8

Housing Opportunities for Persons With AIDS (HOPWA) 8

U.S. Department of Energy (DOE) Energy Programs..... 9

I.A.2 FEDERAL SOURCE - LOCAL ADMINISTRATION9

Montana Continuum of Care Coalition (MT CoCC) for the Homeless.....9

Permanent Supportive Housing 10

This component provides long-term housing with supportive services for homeless persons with disabilities. This type of supportive housing enables special needs populations to live as independently as possible in a permanent setting. Montana currently receives about \$1.6 million in PSH grant funding which provides about 329 beds homeless individuals or families with serious disabilities. This accounts for 63% of all CoC funding. An additional 268 similar beds are being provided through the Veterans Administration VASH vouchers...... 10

Transitional Housing 10

Rapid Rehousing..... 10

U.S. Department of Agriculture Rural Development Program (USDA RD).....10

I.A.3 STATE SOURCE - STATE ADMINISTRATION 11

Montana Department of Natural Resources and Conservation (MDNRC) 11

Renewable Resource Grant and Loan Program (RRGL) 11

Montana Department of Commerce (MDOC).....11

Montana Board of Investments (MBOI).....11

INTERCAP Revolving Loan Program 11

Community Development Division (CDD).....11

Treasure State Endowment Program (TSEP).....12

Quality Schools Grant Program 12

Coal Board 12

Indian Country Economic Development.....13

Primary Sector Workforce Training Grant.....14

Big Sky Trust Fund.....14

Montana Distressed Wood Products Industry Recovery and Stabilization Program..... 14

Montana Board of Housing (MBOH) Programs.....15

Homeownership Programs.....16

Multifamily Programs.....17

Housing Montana Fund.....18

Reverse Annuity Mortgage (RAM) Loan Program 19

I.A.4 METHOD OF FUND DISTRIBUTION TO LOCAL GOVERNMENTS AND OTHER ENTITIES 19

 Community Development Block Grant Programs.....19

HOME Program	20
Emergency Solutions Grant Program.....	21
Housing Opportunities for Persons With AIDS	21
SECTION B – INVESTMENT OF AVAILABLE RESOURCES	22
I.B.1 FEDERAL SOURCE – STATE ADMINISTRATION	22
Emergency Solutions Grant Program.....	24
Housing Opportunities for Persons With AIDS	24
Low Income Housing Tax Credit Program	26
I.B.2 FEDERAL SOURCE - LOCAL ADMINISTRATION	27
U.S. Department of Housing & Urban Development Programs.....	27
<i>Continuum of Care.....</i>	<i>27</i>
<i>Fair Housing Initiatives Program (FHIP) Grants</i>	<i>28</i>
<i>Housing Choice Voucher Family Self-Sufficiency Program (HCV/FSS).....</i>	<i>28</i>
<i>Public Housing Family Self-Sufficiency (PH-FSS) / Resident Opportunities and Self-Sufficiency (ROSS-SC).....</i>	<i>29</i>
<i>Rural Innovation Fund.....</i>	<i>29</i>
<i>Tribal Colleges and Universities Program (TCUP)</i>	<i>30</i>
<i>Capital Fund Education and Training Community Facilities (CFCF) Program</i>	<i>30</i>
<i>Housing Counseling Program</i>	<i>31</i>
<i>Emergency Homeowners Loan Program (EHLP)</i>	<i>31</i>
<i>Public Housing Capital Fund Program.....</i>	<i>32</i>
<i>Sustainable Regional Planning Grant.....</i>	<i>32</i>
I.B.3 STATE SOURCE - STATE ADMINISTRATION.....	33
Montana Department of Natural Resources and Conservation.....	33
<i>Renewable Resource Grant and Loan Program.....</i>	<i>33</i>
Montana Department of Commerce	34
<i>Community Development Division</i>	<i>34</i>
<i>Treasure State Endowment Program (TSEP).....</i>	<i>34</i>
<i>Emergency Grants</i>	<i>35</i>
<i>Quality Schools Facility Grant Program</i>	<i>35</i>
<i>Coal Board Funding</i>	<i>36</i>
<i>Montana Distressed Wood Products Industry Recovery and Stabilization (WPIRS) Program</i>	<i>37</i>
Montana Board of Housing	37
<i>Homeownership Mortgage Revenue Bond Program</i>	<i>37</i>
<i>Mortgage Credit Certificate Program</i>	<i>37</i>
<i>Set-aside Homeownership Mortgage Program (including Disabled Accessible Affordable Homeownership Program providing affordable, architecturally-accessible homes for people with disabilities in order to promote independent living.).....</i>	<i>37</i>
<i>Montana House™.....</i>	<i>37</i>
<i>Risk Sharing, General Obligation Bond, and Conduit Bond Programs.....</i>	<i>38</i>
<i>Reverse Annuity Mortgage Loan Program.....</i>	<i>38</i>
<i>Housing Montana Fund.....</i>	<i>38</i>
I.B.4 GEOGRAPHIC DISTRIBUTION AND LOCATION OF INVESTMENTS.....	38
Maps 38	
<i>CDBG Public Facilities and Housing Rehabilitation Project and Planning Grant Awards April 1, 2014 – March 31, 2015 (map below)</i>	<i>39</i>
<i>FY 2014 CDBG Economic Development Project Awards.....</i>	<i>40</i>
<i>Tri-State HELP Service Area</i>	<i>42</i>
<i>Human Resource Development Councils and Indian Reservations in Montana</i>	<i>43</i>

<i>Continuum of Care Districts in Montana</i>	44
I.B.5 PATTERN OF PLANNED VERSUS ACTUAL INVESTMENT.....	44
I.B.6 LEVERAGING AND MATCHING FUNDS	45
I.B.7 PROJECT MONITORING	46
HOME Program	46
CDBG Program	46
ESG Program.....	47
SECTION C - AFFIRMATIVELY FURTHERING FAIR HOUSING	47
I.C.1 SUMMARY OF IMPEDIMENTS TO FAIR HOUSING CHOICE	47
Analysis of Impediments	47
Other Efforts and Outreach Activities	49
SECTION D – AFFORDABLE HOUSING.....	53
SECTION E – SPECIAL POPULATIONS.....	55
I.E.1 MONTANA CONTINUUM OF CARE COALITION FOR THE HOMELESS.....	55
I.E.2 HOMELESS NEEDS AND HOMELESS PREVENTION.....	56
Montana Statewide Homeless Survey Summary.....	56
Activities to Address Homelessness	57
I.E.3 NON-HOMELESS SPECIAL NEEDS	58
Persons with Disabilities	58
Elderly	58
SECTION F - OTHER ACTIONS UNDERTAKEN	59
I.F.1 ENHANCE INSTITUTIONAL STRUCTURE AND INTERAGENCY COOPERATION AND COORDINATION	59
I.F.2 FOSTER AND MAINTAIN AFFORDABLE HOUSING AND ELIMINATE BARRIERS TO AFFORDABLE HOUSING	64
I.F.3 PUBLIC HOUSING RESIDENT INITIATIVES.....	66
I.F.4 LEAD-BASED PAINT (LBP) HAZARD REDUCTION	66
I.F.5 ANTIPOVERTY STRATEGY.....	67
SECTION G - HOUSEHOLDS AND PERSONS ASSISTED.....	69
CR-55 HOPWA 91.520 (E).....	76
SECTION A - EFFECTIVENESS OF STATE'S PERFORMANCE.....	78
II.A.1 STATE’S EFFECTIVENESS IN MEETING ONE-YEAR (2014-2014) PROGRAM OBJECTIVES.....	78
Housing	78
Homelessness	86
Economic Development	86
Infrastructure and Public Facilities	89
II.A.2 SELF-EVALUATION.....	90
II.A.3 ACQUISITION, REHABILITATION OR DEMOLITION OF OCCUPIED REAL PROPERTY DURING PLAN YEAR 2014	91
SECTION B - PROPOSED ACTIONS RESULTING FROM ASSESSMENT OF ANNUAL PERFORMANCE	91
II.B.1 TECHNICAL ASSISTANCE.....	94
II.B.2 REFINEMENT OF INSTITUTIONAL STRUCTURES.....	96
II.B.3 ISSUES STIMULATING POLICY REFINEMENT	98
Housing	98
Homelessness	102
Infrastructure and Public Facilities	103
Economic Development	104

SECTION C – PERFORMANCE MEASUREMENT	105
Exhibit A – ESG Additional Information	2
CR-60 - ESG 91.520(G) (ESG RECIPIENTS ONLY)	3
CR-65 - PERSONS ASSISTED	8
CR-70 – ESG 91.520(G) - ASSISTANCE PROVIDED AND OUTCOMES	12
CR-75 – EXPENDITURES	14

PART I - CONSOLIDATED ANNUAL PERFORMANCE REPORT

SECTION A - RESOURCES MADE AVAILABLE TO THE STATE

The following discussion separates federal and state funding sources and addresses components pertinent to individual program activities. This discussion does not include all programs that may be available around the state. Information on additional programs is contained in the *Montana Housing Resource Directory*¹.

I.A.1 FEDERAL SOURCE - STATE ADMINISTRATION

Montana Department of Commerce

Community Development Block Grant Program

The Community Development Block Grant (CDBG) program is a federally funded grant program designed to help communities with their greatest community development needs. The program, established by the Federal Housing and Community Development Act of 1974 (42 USC 5301), is administered nationally by the U.S. Department of Housing and Urban Development (HUD). All projects must principally benefit persons of low and moderate income. The Business Resources (BRD) and Community Development (CDD) Divisions within the Montana Department of Commerce (MDOC) administered the CDBG program in Montana for the applicable plan year. For the plan year ended March 31, 2015, the state received \$5,983,857 in Federal Fiscal Year 2014 CDBG funds.

The Community Development Division is responsible for the award and administration of CDBG funds related to Public Facilities, Housing, and Neighborhood Renewal. Within the Public Facilities category, Montana communities most often use CDBG funds in combination with other federal, state, or local funds to make basic community infrastructure improvements such as drinking water and wastewater facilities affordable to persons of low and moderate income. Public facility projects can also include community facilities designed for use predominantly by persons of low and moderate income, such as county hospitals or nursing homes, senior and community centers, Head Start centers, mental health facilities or community food pantries. The CDBG Housing and Neighborhood Renewal category assists communities in a wide range of housing activities with the goal of providing decent, safe and sanitary housing at an affordable price and to reducing blighting influences in the community. All CDBG housing projects must principally benefit persons of low and moderate income. The Division also awards and administers planning grants for a variety of activities, including

¹ *Montana Housing Resource Directory*, Montana Department of Commerce, September 2011 available online at <http://housing.mt.gov/content/FAR/docs/HousingResourceDirectory.pdf>

preparing or updating a growth policy, subdivision regulations or zoning ordinances, preparing an historic preservation or urban revitalization plan, a housing plan, a capital improvements plan, a preliminary engineering or architectural report, or similar planning processes designed to help a community address critical needs.

The CDBG Economic Development (CDBG-ED) program functions within the CDBG-ED Section of the Business Resources Division. The CDBG-ED Section also operates a revolving loan fund, initially funded in 1990 with an \$840,000 grant from the federal Economic Development Administration (EDA). The EDA grant plus \$340,000 of matching CDBG-ED funds initially targeted a project under the EDA Sudden and Severe Economic Deterioration Area program. All payments from the EDA Revolving Loan Fund are received and deposited by Commerce for further relending activities. Local governments manage the EDA loans and yet do not retain loan payments. Once a balance of \$100,000 is available, funds are available for loans.

Neighborhood Stabilization Program (NSP)

The Community Development Division is responsible for the award and administration of the NSP1 and NSP3 funding awarded to the state on July 30, 2008 and July 28, 2010, respectively. Commerce implemented each NSP program in accordance with the appropriate Federal Register Notices and subsequent substantial amendments to the states' Consolidated Plan.

Once NSP-assisted properties are sold, program income provides funding for NSP grantees to continue to work toward eligible activities and provide additional housing units for income eligible households.

Home Investment Partnerships (HOME) Program

Also funded by HUD, the HOME program provides grant funds to units of local government, public housing authorities (PHA), and community housing development organizations (CHDO) to own, sponsor, or develop affordable housing for low-income persons. The Commerce Community Development Division administers the statewide HOME program. The purposes of this program include expanding the supply of affordable housing for low- and very low-income persons, improving the means for state and local governments to implement strategies to achieve adequate supplies of decent, affordable housing, and providing financial and technical assistance to participants to develop model programs for affordable housing. Funds available in the plan year ended March 31, 2015 totaled \$3,017,887. HOME program income and recaptured funds expended \$502,628.69 during the plan year. HOME expended \$962,929.74 of direct funds during the plan year.

Low Income Housing Tax Credit (LIHTC) Program

The Low Income Housing Tax Credit is available under Section 42 of the Internal Revenue Code (IRC) of 1986. The credit is a federal income tax credit for owners of

qualifying rental housing meeting certain low-income occupancy and rent limitation requirements. The amount of tax credit that the Montana Board of Housing (MBOH) may allocate annually for housing is approximately \$2,500,000 per year, which includes a cost of living increase for Montana. MBOH administratively attached to Commerce, the state agency that administers the program and allocates tax credits for housing located in Montana.

Section 8 Housing Assistance Programs

Financed by HUD and administered by the Housing Division, Tenant Based Section 8 Housing (TBS8) Assistance programs allow very low income families to pay a set amount for rent and utilities, based on their gross adjusted income (currently 30%). Very low income families have incomes of 50% or less of the HUD median family income for the county in which the family resides. HUD establishes income limits annually. The programs provide subsidy payments to property owners on behalf of program participants.

The TBS8 program, using 37 local field agents in 11 locations throughout the state, provides field services: issuing assistance documents, performing inspections, and examining annual income. The wait list to obtain a voucher is roughly 18 months with approximately 5,000 applicants. The Housing Choice Vouchers is the main program in TBS8, with a HUD baseline of 3,834 units and an annual budget of approximately \$16.7 million.

The Moderate Rehabilitation (Mod Rehab) program is a project-based program with 309 rental units. TBS8 subsidizes the rental units, provides a list of prospective tenants to owners, and inspects the rental units annually to insure continued compliance with HQS. Initially, owners of substandard property in Montana rehabilitated the property to meet HUD housing quality standards (HQS) and received subsidized rent for 15 years at a rate high enough to cover the debt service on rehabilitation loans. All Mod Rehab properties are past the 15-year period and have moved to annual contracts.

During the plan year beginning April 1, 2011, the Montana Project Based Section 8 (PBS8) program performed as a HUD contractor providing management and oversight activities for 89 contracts involving 4,102 affordable rental units. PBS8 conducts on-site management reviews annually for the entire contract portfolio. In addition, PBS8 approves and processes payment vouchers to property owners and agents.

HUD-Veterans Affairs Supportive Housing (VASH) Voucher Program

The 2008 Consolidated Appropriations Act (Public Law 110-161) enacted December 26, 2007, provided \$75 million dollars of funding for the HUD-Veterans Affairs Supportive Housing voucher program as authorized under Section 8(o)(19) of the United States Housing Act of 1937. The HUD-VASH program combines HUD housing choice voucher

rental assistance for homeless veterans with case management and clinical services provided by the Veterans Affairs at its medical centers and in the community.

Montana was originally awarded 35 vouchers to assist homeless veterans and their families in partnership with Veterans Affairs, Homeless Veteran Program, located at Fort Harrison. Currently, all voucher holders are either housed or in the process of being housed in Missoula, Helena and surrounding areas. The Billings Housing Authority has an additional 100 vouchers. In 2010, and again in 2011, MDOC received 25 additional vouchers, allowing increased assistance to veterans in Western Montana. In 2012, an additional 50 vouchers were awarded to MDOC to serve Great Falls, the highline, Butte, Bozeman, and Helena. In 2015 HUD awarded 31 vouchers for use in the Kalispell area, raising MDOC's VASH voucher total to 281.

Montana Department of Public Health and Human Services (MDPHHS)

Emergency Solutions Grant (ESG) Program

The Intergovernmental Human Services Bureau (IHSB) of the Montana Department of Public Health and Human Services administers the HUD-funded Emergency Solutions Grant program. The program received \$558,700 for fiscal year 2014. It has expended \$766,617 for the plan year ending March 31, 2015. This includes overlapping contract periods, which accounts for the amount variance.

Created in 1986, ESG funds a broad range of eligible activities, including converting, renovating and rehabilitating facilities, operating facilities, delivering essential services, and preventing homelessness. ESG funding enables service providers to expand available emergency shelter capacity to broaden the range of services available to clients. ESG-funded entities may be either shelter or non-shelter providers. The ESG program was substantially changed in 2012 when the program changed from Emergency Shelter Grant to Emergency Solutions Grant, and funding was now available for Rapid Re-Housing and other activities previously provided under the Homeless Prevention Rapid Re-Housing program, which ended in 2012.

The IHSB distributes the funds to the states ten Human Resource Development Councils (HRDCs), which together cover virtually all of Montana (see map on page 42). The HRDCs use the funds to meet the needs of the homeless or those at risk of homelessness at the local level.

Housing Opportunities for Persons With AIDS (HOPWA)

HOPWA funds support HUD's national goal of increasing the availability of decent, safe, and affordable housing for meeting the housing needs of persons with HIV/AIDS and their families. Grantees are encouraged to develop community-wide comprehensive strategies and to form partnerships with area nonprofit organizations to provide housing assistance and related services for eligible persons.

Public Health and Human Services administers competitively funded HOPWA grants for a three-state region that includes Montana, North Dakota, and South Dakota. The Tri-State Housing Environments for Living Positively (TS HELP) is a partnership between Public Health and Human Services and four private agencies: the Sioux Falls Housing and Redevelopment Commission in South Dakota, Region VII Community Action Program in North Dakota, and Open Aid Alliance and Yellowstone AIDS Project in Montana (see map on page 42). The HOPWA grant allows TS HELP to operate its programs providing a continuum of housing and related supportive service opportunities for people living with HIV/AIDS and their families serving these three states.

U.S. Department of Energy (DOE) Energy Programs

U.S. Department of Energy funds available for weatherization assistance totaled \$1,640,408 for the year ending in June 2015. Additional weatherization funds were provided by the U.S. Department of Health and Human Services for the Low Income Energy Assistance Program (LIEAP), Northwestern Energy, Bonneville Power Administration, and Universal System Benefits/Montana Dakota Utilities (USB/MDU) funds. The total weatherization funds reported were \$6,847,834. Public Health and Human Services Intergovernmental Human Services Bureau administers the program. The expenditures are higher than available funds due to timing.

The Weatherization program provides cost-effective energy conservation measures for low-income households, and typically includes heating system tune-ups, air infiltration reduction, and attic, wall and floor insulation. During the year, the program weatherized an estimated 855 homes in Montana, for a total energy savings of more than 26,078 BTUs. Weatherization measures demonstrating a savings to investment ratio of at least 1.0 (based on the use of a computerized energy audit) are installed on eligible dwellings.

I.A.2 FEDERAL SOURCE - LOCAL ADMINISTRATION

Montana Continuum of Care Coalition (MT CoCC) for the Homeless

The following programs are available to local groups on a competitive basis through the McKinney-Vento Act and the federal HUD Continuum of Care program.

Permanent Supportive Housing

This component provides long-term housing with supportive services for homeless persons with disabilities. This type of supportive housing enables special needs populations to live as independently as possible in a permanent setting. Montana currently receives about \$1.6 million in PSH grant funding which provides about 329 beds homeless individuals or families with serious disabilities. This accounts for 63% of all CoC funding. An additional 268 similar beds are being provided through the Veterans Administration VASH vouchers.

Transitional Housing

The transitional housing component facilitates the movement of homeless individuals and families to permanent housing. Homeless persons may live in transitional housing for up to 24 months and receive supportive services such as childcare, job training, and home furnishings that help them live more independently. Transitional Housing, however, is being replaced more and more by Rapid Rehousing as a more efficient form of housing assistance. While Montana currently still receives about \$580,500 for transitional housing, this accounts for about only twenty-two percent of all CoC funding compared to forty-one percent as recently as 2012.

Rapid Rehousing

Since HUD implemented changes in the CoC grant competition encouraging TH projects to reallocate funds to Rapid Rehousing, the Montana CoC has reallocated six transitional housing projects to Rapid Rehousing accounting for forty percent of its' transitional housing funding and it anticipates reallocating at least two more projects in the upcoming grant cycle. For the same amount of funding, 108 TH beds have been converted to 124 RR beds which are expected to turnover faster than TH beds thereby serving more homeless persons enroute to stable, permanent housing. The RR program is still in the early stages of implementation without enough data yet to assess performance.

Eligible applicants for all program components include States, local governments, other government agencies (such as public housing agencies), private nonprofit organizations, and community mental health associations that are public nonprofit organizations.

U.S. Department of Agriculture Rural Development Program (USDA RD)

USDA RD program funds several different housing programs for very low, low, and median income borrowers, including Single Family Housing Direct Loans (502), Repair and Rehab Loans and Grants (504), and Guaranteed Rural Housing Loans. USDA RD funds Multi-Family Housing Direct Loans and Guarantees, Rural Rental Assistance, Mutual Self-Help Grants, and Housing Preservation Grants.

Additionally, USDA RD program funds infrastructure and community facility projects in communities that are less than 30,000 in population. USDA RD is a typical leverage source for infrastructure projects in several communities.

I.A.3 STATE SOURCE - STATE ADMINISTRATION

Montana Department of Natural Resources and Conservation (MDNRC)

Renewable Resource Grant and Loan Program (RRGL)

The Montana Department of Natural Resources and Conservation administers the RRGL program. Financial assistance is available to local governments in the form of grants or loans. Funds are used for grants up to \$125,000 and for securing loans for water and sewer projects. The Legislature biennially appropriates funds for RRGL infrastructure projects, planning grants, and to provide grants for emerging projects.

Montana Department of Commerce (MDOC)

Montana Board of Investments (MBOI)

INTERCAP Revolving Loan Program

The Montana Board of Investments issues bonds and lends the proceeds to eligible Montana governments for a variety of purposes. Since the program's inception, the Board has issued \$148.0 million in bonds with \$106.4 million outstanding at March 31, 2015. The Board makes firm one-year commitments to fund the loans. Eligible borrowers may use the program to obtain short and long-term variable rate loans, as well as bridge financing. From April 1, 2014 to March 31, 2015, the program committed to \$31.8 million in loans and funded \$24.9 million. Loans from program inception in 1987 to March 31, 2015 total \$445.7 million.

Community Development Division (CDD)

Community Technical Assistance Program (CTAP)

CTAP provides technical assistance to encourage the planning and sustainable development of Montana communities by working with local governments, planning departments, private developers, non-profit organizations and the public. CTAP brings a statewide and national problem-solving perspective to every community by staying abreast of how other local governments, the private sector, and the courts are handling specific land use and planning-related issues. While CTAP is available to serve communities and constituents statewide, particular focus has recently been placed on communities experiencing land use impacts and resulting infrastructure needs related to rapid population growth as a result of oil and gas development.

Treasure State Endowment Program (TSEP)

The Treasure State Endowment Program is a state funded grant program designed to assist local governments with financing infrastructure projects to help solve serious health and safety problems and keep the cost of the projects at an affordable level. Local governments can use TSEP funds to construct or repair drinking water systems, wastewater treatment facilities, sanitary or storm sewer systems, solid waste disposal and separation systems, and bridges. Any incorporated city or town, county, or consolidated local government; county or multi-county water, sewer or solid waste district; or tribal government is eligible to apply to TSEP.

Construction grants for infrastructure activities have a ceiling of \$750,000. A 1:1 match is required, but other loans or grants qualify as match. CDD awards funding for construction projects through the legislative process, with applications due in May of the year proceeding the legislative session.

The legislature appropriates funds for TSEP infrastructure planning grants and to provide grants for emergency projects that cannot wait for legislative approval. Both planning and emergency grants are noncompetitive and Commerce makes awards on a first-come first-served basis.

Quality Schools Grant Program

The Quality Schools Facility Grant Program, created in 2009, is a competitive grant program providing (1) school facility project grants; (2) matching planning grants; and (3) emergency grants for public school districts in the State of Montana (elementary and high school districts as defined in Section 20-6-101, MCA, or a K-12 school district as defined in Section 20-6-701, MCA). Commerce receives project, planning, and emergency funds via legislative appropriation and then awards grants during the biennium. The staff of the Quality Schools Grant Program provides technical assistance for all grantees to complete each project in a timely manner.

Coal Board

The Coal Board is a seven-member board, appointed by the Governor, administratively attached to Commerce. Coal Board funding is awarded to local governments, school districts, state agencies, and tribal governments with the impacts that are a direct consequence of coal development or as a result of major decline in coal-related activities.

Eligible entities can use funds on eligible activities including planning and/or project activities needed in coal-impacted communities. Coal Board funds leverage other state or federal grant programs. CDD receives applications, which the Coal Board reviews at quarterly public meetings.

Montana Main Street Program

The Montana Main Street program, provided for in Section 90-1-151, MCA and funded with state general funds and is the state affiliate of the National Trust Main Street Center. The Montana Main Street Program provides technical assistance and training in the areas of economic development, downtown revitalization and historic preservation to communities of all sizes. In addition, the Montana Main Street program sponsors regional workshops and community training sessions, and is an active participant in the annual Downtown Conference, which offers the most comprehensive downtown development and historic preservation gathering in the state.

Hard Rock Mining Impact (HRMI) Board

The HRMI Board, a five-member, quasi-judicial board appointed by the Governor, is attached to MDOC for administrative purposes. The HRMI Board administers the Hard-Rock Mining Impact Act and the companion Property Tax Base Sharing Act (PTBS), provides technical assistance with metal mines license tax distributions, and adjudicates disputes between affected entities. The purpose of HRMI and PTBS Acts is to mitigate the local government service, facility and fiscal impacts from new large-scale hard-rock mineral developments in the state. Mineral developers and affected local governments prepare and implement impact plans intended to ensure that local government services and facilities are available when and where needed because of new mineral developments, without imposing additional costs on the existing local taxpayer. The developer pays new capital and net operating costs through prepaid property taxes with a subsequent tax credit, grants, or facility impact bonds. Under specified circumstances, affected entities may petition the HRMI Board to amend approved impact plans.

Business Resources Division (BRD)

Indian Country Economic Development

Indian Country Economic Development (ICED) funds have been available to tribal governments since October 2005 when the 59th Montana Legislature made funds available to support tribal business development projects, workforce training projects, entrepreneurial training, feasibility studies, and other types of economic development projects. The ICED Program splits funding among three main activities: tribal government projects, tribal member business start-up or expansion, and entrepreneurial training for tribal populations.

Funds are made available for equal distribution to the governing body of each tribal government in Montana and to the governing body of the Little Shell Tribe for economic development projects. The application period is from July 1 to March 31 of each fiscal year. The project must produce a positive economic benefit for the Tribe(s). A tribal resolution must accompany the application, and a 1:1 funding match is required.

Funds were available to enrolled individual tribal member's businesses for business expansion or start-up within the tribal communities. A 1:1 match is required. The intent was that awards be made to two tribal member businesses per tribal nation (including the Little Shell Tribe of Chippewa Indians) and one at-large award.

Additionally, funds were made available for trainings in each of the eight tribal communities including the Little Shell Tribe of Chippewa Indians for entrepreneurial business training, Indianpreneurship, A Native Journey Into Business[®].

Primary Sector Workforce Training Grant

The Workforce Training Grant (WTG) program targets primary sector businesses that create at least one net new job that pays at least the average wage that meets or exceeds the lesser of 170% of Montana's current minimum wage or the current average weekly wage of the county. Wages can include benefits. Employees must work a minimum of 25 hours per week year round. The program is designed for primary sector businesses with 50% of sales from outside of Montana, or a manufacturing company with 50% of its sales from companies that have 50% of their sales outside of Montana, or a new business that provides a product or service that is not available in Montana; including for-profit and nonprofit hospitals and medical centers, that are expanding and adding new jobs and provide the opportunity to train workers in specific skill sets. The business' financial statements must support the business expansion. The Montana Department of Labor and Industry (MDOLI) must approve the training curricula.

The WTG program can fund up to \$5,000 in eligible training expenses for new full-time jobs and up to \$2,500 for new part-time jobs with a match of \$1 for \$3 of state funds.

Big Sky Trust Fund

The 2005 Montana Legislature created the Big Sky Economic Development Trust Fund (BSTF), to aid in the development of good-paying jobs for Montana residents and to promote long-term, stable economic growth in Montana. Interest earnings from the BSTF are available for financial assistance to local governments and economic development organizations through application to the MDOC. Commerce awards seventy-five percent of BSTF earnings to local and tribal governments in the form of grants to assist businesses in creating new qualifying jobs for Montana residents. Certified Regional Development Corporations (CRDCs), tribal governments, and other eligible economic development organizations receive the other twenty-five percent of BSTF earnings in the form of grants for economic development planning.

Montana Distressed Wood Products Industry Recovery and Stabilization Program

The Montana Distressed Wood Products Industry Recovery and Stabilization (WPIRS) Program is a federally and state-funded, statewide loan program designed to help

businesses in the wood products industry retain or create jobs. The Montana Legislature established the program in 2009 to respond to the sudden and severe economic downturn of the national economy, and the lowered demand for wood products. The WPIRS program targets areas of the state where timber jobs are threatened most, particularly in counties with lumber mills and similar facilities.

The WPIRS program, which is comprised of three funding sources:

1. U.S. Department of Commerce, Economic Development Administration (EDA WPIRS)
2. State of Montana General Fund (State WPIRS)
3. HUD Community Development Block Grant Recovery Program, ARRA 2009 (CDBG-WPIRS)

Commerce may loan EDA WPIRS funding to individuals, including private contractors related to the wood products industry, and wood product businesses, who may primarily use the assistance to provide working capital, equipment loans, and other activities that do not include contracted labor and construction. Businesses must provide at least two non-WPIRS dollars for each dollar of EDA WPIRS funds requested (a 2:1 leveraged ratio). EDA WPIRS recipients must comply with a variety of EDA and ARRA 2009 requirements.

Commerce may loan State WPIRS funding to private contractors in the wood products industry or to businesses defined as small businesses (pursuant to the regulations promulgated by the U.S. Small Business Administration pursuant to 13 CFR 121, *et seq.*). Individuals or small businesses receiving loans must be part of the critical, primary wood processing infrastructure and must have suffered economic hardships.

Borrowers may use the loans for working capital, purchase or lease of land or equipment, updating infrastructure, debt service, etc. Businesses must provide at least one non-WPIRS dollar for each dollar of State WPIRS funds requested (a 1:1 leveraged ratio). State WPIRS recipients must comply with a variety of Montana Reinvestment Act (HB 645) requirements.

Recipients of CDBG WPIRS funds were distressed wood product- and timber-related businesses that suffered economic downturn during the Great Recession. All applicable CDBG program requirements applied to the use of CDBG WPIRS funds.

All proceeds from CDBG WPIRS loans are program income and are available to any eligible CDBG economic development project.

Montana Board of Housing (MBOH) Programs

The mission of MBOH is to alleviate the high cost of housing for low- and moderate-income persons and families. The sale of tax-exempt bonds or administrative fees

generate the funds to operate the programs administered under the Housing Act of 1975. MBOH programs are often used in combination with HOME and CDBG funds, where MBOH provides permanent financing or equity financing.

Homeownership Programs

- Homeownership Mortgage Revenue Bond (MRB) Program: The Homeownership MRB program began in 1977. Its purpose is to assist low- and moderate-income Montanans to purchase homes in the state. MBOH issues tax-exempt mortgage revenue bonds to provide below market rate funds to finance first mortgages for households who purchase existing or construct new housing. Primarily, MBOH intends this program for first-time homebuyers; however, in certain "targeted" areas, the borrowers do not need to be first-time buyers. Minimum qualifying criteria include certain income requirements, house price restrictions, and other criteria. Loan fund availability and mortgage rates vary with each new bond issue.
- Mortgage Credit Certificate (MCC) Program: The MCC program allows a qualified homebuyer to claim up to 20% of annual mortgage interest paid as a federal income tax credit. The remaining mortgage interest (80%) continues to qualify as an itemized deduction. The MCC may be used in conjunction with any conventional fixed or adjustable rate loan, FHA, VA or RD loans, or privately insured mortgage loans statewide including loans made in Indian Country, except a loan made through the MBOH bond program.
- Set-aside Homeownership Mortgage Program: MBOH makes mortgage funds available through recycling mortgage prepayments and other funds held under prior bond issues of the Homeownership MRB program. MBOH works in partnership with local nonprofit housing providers and local governments to develop programs to target specific housing needs within the local community. MBOH generally provides first mortgage financing using below market rate, 30-year mortgages, usually coupled with federal grants or local funds to assist in making homeownership more affordable for lower income individuals and families. Nonprofit housing providers and local governments may submit applications for new set-aside programs each month through MBOH's "Request for Proposal" process.
- Disabled Accessible Affordable Homeownership Program: In 1993, MBOH initiated the Disabled Accessible Affordable Homeownership program for persons with disabilities to help them acquire affordable, architecturally accessible homes. Qualifying for this program requires that an eligible homebuyer, spouse, child, or parent have a permanent physical disability with a mobility impairment, meet income and family asset limits, and be a first-time homebuyer or have a home purchased prior to the disability that is no longer accessible to their needs. Interest rates vary depending on the buyer's annual income.
- Montana House™: MBOH and the Blackfeet Housing Authority with Blackfeet Manpower and the Fort Belknap College have collaborated to establish the Montana

House™ program. MBOH provides building materials for the homes. At the training sites, students build homes as part of their vocational training curriculum. The homes are available for purchase by individuals or families meeting the Homeownership MRB program criteria.

The Montana House™ is a three-bedroom, two-bath new home that is available in four different floor plans: 960, 1,008, 1,200, or 1,400 square feet. Each home features 2x6 exterior walls with R-19 insulation, quality vinyl windows, oak kitchen and bath cabinets, and energy efficient gas forced air furnace. The home comes complete except for appliances and flooring, which the homebuyer provides. The homebuyer is also responsible for the lot, foundation, moving from the building site, placement on the foundation and utility hook-ups and fees. The Blackfeet Housing Authority provides technical assistance for these functions.

- Montana Veterans' Home Loan Program: The 2011 Legislative Session established the Montana Veterans' Home Loan Mortgage Program, following introduction of the bill by Senator Larsen from Missoula. The program uses funds from the principal of the Montana Coal Tax Trust Fund and is a permanent Revolving Loan fund for Veteran Home Loans. The program assists Montana residents who are National Guard members, reservists or federally qualified veterans to purchase their first home. This program helps fulfill part of the Montana Constitution that asks us to Honor all those who serve our country in the military. \$30 million of principal from the Montana Coal Tax Trust Fund funds the Montana Veterans' Home Loan Program. First mortgage loans are administered by the Montana Board of Housing and purchased by Montana Board of Investments. The rate will be 1% below the current market rate, that is, the Montana Board of Housing regular program rate or the Fannie Mae 60 day lock rate, whichever is lower. The rate will be updated every two weeks.

Multifamily Programs

MBOH issues tax-exempt bonds to finance the construction of new and rehabilitation of existing, low income, multi-family housing. MBOH issues the bonds to finance projects that meet its requirements through the Multi-Family Risk Sharing, General Obligation and Conduit Bond programs.

- Risk Sharing Loan Program: The Risk Sharing program provides FHA mortgage insurance for permanent financing of multi-family rental property through a partnership between MBOH and HUD. MBOH provides mortgage underwriting, loan management, and financing, and the two entities share the risk of loss from default. MBOH received final approval to participate in the Risk Sharing program with HUD in June 1994.
- General Obligation (G.O.) Program: The G.O. bond program provides permanent mortgage financing for multi-family rental property. The program requires that the

rental property owner agree to restrict the rents to a specific amount and to rent only to tenants below a maximum income level (generally 60% of median income). Currently this program finances permanent loans for projects receiving multiple sources of funding where rents on the projects are affordable to very low-income state residents.

- Conduit (Private Placement) Bond Program: The conduit bond program provides another vehicle for financing acquisition and or rehabilitation of affordable multi-family housing. MBOH makes tax-exempt bonds available for purchase by a financial institution, which in turn, makes loans to MBOH-approved projects in Montana. Applications parameters are same as those for Low Income Housing Tax Credits and are eligible for tax credits at approximately 4% or the prevailing monthly federal rate. These tax credits are not subject to a competitive selection process as with those the U.S. Treasury (IRS) has made available, but must comply with Section 42 of the IRS codes and state requirements. This program provides resources for retaining or adding additional affordable housing for Montana.
- RD 538: The MBOH has become an approved Section 538 program lender through Rural Development 538 provides government guaranteed loans for the development of affordable rural rental housing with at least five units. A Section 538 guaranteed loan can combine with other financing sources such as Low Income Housing Tax Credits, a HOME grant or loan, state or local assistance (including tax-exempt bond financing).

Housing Montana Fund

The 1999 Montana legislative session created the Affordable Housing Revolving Loan Account (renamed the Housing Montana Fund in 2007) and assigned it to the Board to administer. The Fund is funded by: 1.) a one-time Federal Home Loan Bank grant of \$1,500,000 that was loaned to eight preservation housing projects in Montana (the Board also holds permanent first mortgages on these projects); 2.) a transfer of \$500,000 of Section 8 reserve funds loaned to three housing projects; and 3.) an allocation of \$700,000 of Temporary Assistance for Needy Families funds used for homebuyer assistance. The Fund has no continuous source of funding, thereby limiting the ability of the Fund to fund additional projects in the future. MBOH administers the fund, which can be used to provide financial assistance in the form of direct loans for the following purposes:

- Matching funds for public or private money available from other sources for the development of low income and moderate-income housing
- Bridge financing necessary to make a low income or moderate-income housing development feasible
- Acquisition of existing housing for the purpose of preservation of or conversion to low-income or moderate-income housing

- Pre-construction technical assistance to eligible recipients in rural areas and small cities and towns

Organizations eligible for loans from the revolving loan fund are state and local governments, state agencies or programs, tribal governments, local housing authorities, nonprofit community or neighborhood-based organizations, regional or statewide nonprofit housing assistance organizations, or for-profit housing developers. Borrowers must repay all interest and principal on loans, which have a 30-year term. Once loans pay off, funds are recycled for use in new loans.

Reverse Annuity Mortgage (RAM) Loan Program

The RAM program enables senior Montanans to benefit from an additional monthly income source by borrowing against the equity in their home. Eligibility is subject to certain age and income requirements. Currently, a participant must be 68 years of age or older (some exceptions may apply). Loans of \$15,000 to \$150,000 are available at a 5% interest rate, based on 80% of the FHA determined property value. The loans do not require repayment as long as the homeowner remains in the home. Once loans pay off, funds are recycled for use in new loans.

I.A.4 METHOD OF FUND DISTRIBUTION TO LOCAL GOVERNMENTS AND OTHER ENTITIES

Community Development Block Grant Programs

Commerce determines fund distribution for the CDBG competitive Housing and Public Facilities categories via annual competitions for each category. Eligible applicants are limited to local governments: counties and incorporated towns and cities under 50,000 in population. The maximum grant request for each project grant is \$450,000. Grantees with open grants must significantly draw down their existing funds before they are eligible to apply for additional program funds from CDBG. Each local government may apply for one housing project and one public facility project each program year, provided any earlier funded projects within the same category are substantially completed.

The CDBG Economic Development program accepts applications on a continuous basis as long as funding is available for the current program year. Like CDBG Housing and Public Facilities, eligible applicants for CDBG-ED funds are limited to local governments (counties and incorporated towns and cities) except for the cities of Billings, Great Falls, and Missoula, which receive CDBG Entitlement funds. The maximum grant request a local government can make in a program year is \$400,000. Local governments typically used CDBG-ED funds to make loans to area businesses. A local government may manage loan repayments if it can demonstrate to the MDOC that it has the capacity to administer a local revolving loan fund (RLF) or that it will contract with a qualified local development organization for RLF management.

Funding for Housing and Neighborhood Renewal Projects, Public Facilities Projects and Economic Development Projects

Method of Distribution for the 2014 Annual Action Plan

As approved by HUD, in the 2014 Annual Action Plan, the Montana Department of Commerce carried out the method of distribution for the Montana CDBG Program in the following manner. Upon receipt of the \$5,847,967 award announcement of HUD-CDBG funding, Commerce subtracted 3% of the funds plus \$100,000 (\$279,515) for program administration and technical assistance dollars from the state's annual award. Thirty-four percent (34%) of the balance (\$1,894,660) was allocated to the Business Resources Division for CDBG-ED and the remainder to the Community Development Division for CDBG-Public Facility and Housing and Neighborhood Renewal projects and planning grants.

Additionally, the MDOC Director had the discretion to award CDBG funds between categories in order to be flexible and have the ability to respond to the needs of Montana's communities as demonstrated through the number of applications received by the CDBG program. No modifications to the method of distribution occurred during this plan year.

HOME Program

HOME program funds available from HUD in the plan year ended March 31, 2015 totaled \$3,017,887. Commerce distributed the funds through both a noncompetitive process and competitive grant application process. The HOME program received only one application for the 2014 competitive funds. The HOME program immediately went to an open application round that allows the entitlement cities of Great Falls, Billings, and Missoula. Public housing authorities (PHAs) and community housing development organizations (CHDOs) operating within city boundaries, to submit applications.

Eligible applicants include general-purpose local governments (counties, incorporated cities and towns, and consolidated city-county governments), community housing development organizations certified by Commerce, and public housing authorities. The maximum request for a HOME project under the competitive application process is \$750,000. CHDOs receive a minimum of 15% set-aside of each fiscal year's allocation.

Existing grantees are eligible to reapply for a competitive HOME grant if they are in compliance with the current project implementation schedule, have no unresolved audit, monitoring or performance findings on any previous grants, and have met spend down requirements. For the 2014 program year, Grantees with an open FFY 2012 grant must have had 50% of the project funds drawn down by the application due date; Grantees with an open FFY 2011 grant must have had 75% of the project funds drawn down by the application due date. Grantees with grants three years and older (FFY 2010 and

earlier grants) must have completed and conditionally closed out the grant before applying for additional funds. CHDOs applying for a CHDO-eligible activity must meet the applicable spend down requirements at the county level.

The HOME program's allocated \$2,200,000 to three multifamily development activities. Two of these projects are new rental developments that will provide 42 combined units for low- to middle-income households and one project will rehabilitate 24 units of low-income senior rental units.

The HOME program's Single Family Noncompetitive Program (SFNP) allocated \$200,000 in 2014.

To access the funds, eligible entities (cities, towns, counties, PHAs, and CHDOs) submit a qualification package. There is no deadline, no application, and no scoring. Once an entity is qualified, it enters into a two-year contract with Commerce and begins conducting its single-family program.

During the calendar year 2014, Commerce received and subsequently expended \$502,628.69 of program income and recaptured funds on additional HOME-eligible activities.

Emergency Solutions Grant Program

The 10 regional HRDCs (see map on page 43) receive 85% of the funds allocated under this program. Funds are distributed based on a formula allocation contained in ARM 53-10-502 pertaining to the federal Community Services Block Grant. This allocation reflects areas of poverty and general population.

Housing Opportunities for Persons With AIDS

In 2011, the DPHHS received a HOPWA renewal grant of \$1,474,000 to continue operating the Tri-State Housing Environments for Living Positively Program. Serving three states that do not qualify for direct HOPWA formula grant funding, this program is a continuum of housing and related supportive service opportunities for people living with HIV/AIDS and their families. TS HELP is a partnership between Public Health and Human Services and four private agencies: the Sioux Falls Housing and Redevelopment Commission in South Dakota, Region VII Community Action Program in North Dakota, and Open Aid Alliance and Yellowstone AIDS Project in Montana (see map on page 42).

In 2005, TS HELP received \$1.4 million to address the need for housing case management in three of the four regions. Under this grant, TS HELP Plus, the sponsors were able to hire three housing case managers and increase tenant based rental assistance (TBRA) and short-term rent, mortgage, and/or utility (STRMU) assistance in the three states. In 2012, HUD approved the HOPWA Plus grant of \$1,482,040 for

operation of the TS-HELP Plus program and continued funding the housing case managers.

SECTION B – INVESTMENT OF AVAILABLE RESOURCES
I.B.1 FEDERAL SOURCE – STATE ADMINISTRATION
Community Development Block Grant Program

CDD CDBG Projects funded during the 2014 Program Year Public and Community Facility Awards			
Applicant	Project Type	Total Project Cost	Awarded Amount
City of Hamilton	Wastewater	\$ 1,588,000	\$ 450,000
Town of Lodge Grass	Wastewater	\$ 2,420,000	\$ 450,000
Madison County	Nursing Home Rehabilitation	\$ 848,576	\$ 450,000
Powder River County	Nursing Home Rehabilitation	\$ 586,500	\$ 450,000
Town of Winnett	Wastewater	\$ 2,304,000	\$ 450,000
TOTAL		7,747,076	\$ 2,250,000

CDD CDBG Projects funded during the 2014 Program Year Housing and Neighborhood Renewal Awards			
Applicant	Project Type	Total Project Cost	Awarded Amount
City of Glendive (Makoshika Estates Senior Housing)	Housing – Senior Apartments	\$ 2,031,115	\$ 450,000
Lewis and Clark County (Rehabilitation Homeless Shelter for Women)	Housing - Shelter	\$ 2,691,468	\$ 450,000
TOTAL		\$ 4,722,583	\$ 900,000

CDD CDBG Planning Funded During the 2014 Program Year Planning Grant Awards			
Entity	County	Project Type	Award
Gallatin County	Gallatin	Preliminary Architectural Report and Feasibility Study to build on existing Housing Plan	\$30,000
Fairview, Town of	Richland	Zoning Ordinance Update	\$15,000
Bozeman, City of	Gallatin	Comprehensive Review of Neighborhood Conservation Overlay District	\$30,000
Sidney, City of	Richland	Capital Improvements Plan with Needs Assessment Survey	\$30,000
Scobey, City of	Daniels	Update to 2008 Capital Improvements Plan	\$6,000

Consolidated Annual Performance & Evaluation Report

Glacier County	Glacier	Preliminary Architectural Report for Blackfeet Community College Health Science/Service Building	\$30,000
Anaconda Deer Lodge	Anaconda Deer Lodge County	Downtown Master Plan	\$15,000
West Yellowstone, Town of	Gallatin	Preliminary Architectural Report and Feasibility Assessment for Affordable Housing	\$30,000
Park County	Park	Comprehensive CIP	\$10,000
Stanford, Town of	Judith Basin	Completion of Growth Policy	\$25,000
Thompson Falls, City of	Sanders	Downtown Master Plan	\$19,500
Roosevelt County	Roosevelt	Preliminary Architectural Report for Senior Center in Poplar	\$26,000
Dillon, City of	Beaverhead	Downtown Master Plan	\$30,000
White Sulphur Springs, City of	Meagher	Preliminary Architectural Report for Spring Manor Apartments	\$15,000
Neihart, Town of	Cascade	Preparation of Growth Policy	\$7,500
Conrad, City of	Pondera	Zoning Ordinance & Subdivision Regulation Update	\$11,250
Columbus, Town of	Stillwater	Capital Improvements Plan	\$30,000
Sanders County	Sanders	Completion of Preliminary Architectural Report for Noxon Senior Housing Project	\$20,000
Mineral County	Mineral	Update Growth Policy	\$15,000
Phillips County	Phillips	Preliminary Architectural Report for Senior Center and Transit Facility in Malta	\$30,000
Dodson, Town of	Phillips	Capital Improvements Plan	\$5,000
Harlem, City of	Blaine	Housing Study for Harlem, Malta and Chinook	\$30,000
Chinook, City of	Blaine	Housing Study for Harlem, Malta and Chinook	\$15,000
Teton County	Teton	Growth Policy Update	\$9,750
Judith Basin County	Judith Basin	Preparation of Growth Policy	\$15,000
Polson, City of	Lake	Growth Policy Update	\$7,150
		TOTAL	\$507,150

BRD CDBG-ED Projects funded during the 2014 Program Year Economic Development Awards			
Applicant	Project Type	Total Project Cost	Awarded Amount
Sanders County	Planning-reuse of old elementary school building	\$20,000	\$16,000
Custer County	Planning – creation of PER for water line	\$30,000	\$15,094
Flathead County	Loan to business for purchase of equipment	\$800,000	200,000

Mineral County	Loan to business for electrical upgrades and purchase of equipment	\$352,839	\$176,376
TOTAL		\$ 1,202,839	407,470

HOME Investment Partnerships Program

HOME Program FFY 2014 Awards			
Applicant	Project Type	Total Number of Units	Awarded Amount
Missoula Housing Authority	New Construction	6 units	\$ 700,000
Richland County	Multi-Family New construction	36 units	\$ 750,000
District XI HRC	Senior Rental Rehabilitation	24 units	\$ 750,000
District XI HRC	Down payment & closing cost assistance		\$ 200,000
TOTAL		66	\$ 2,400,000

Emergency Solutions Grant Program

The Montana Department of Public Health and Human Services (DPHHS) distributes ESG funds to HRDCs throughout Montana for supported shelters across the state as well as for direct services from HRDCs to ESG recipients. Actual funding received and funding used matched the funds anticipated.

The HRDCs use the funds to meet the needs of the homeless or those at risk of homelessness at the local level. Activities include rental assistance, financial assistance of rental application fees, security and utility deposits and payments, case management, housing search and support for toll free telephone referral hotlines for domestic abuse and other homeless individuals and families; and referral to mainstream resources; assistance to shelters for the homeless and victims of domestic and sexual violence, youth homes, and food banks.

Agencies participate in essential service activities by working with other state, faith- and community-based organizations and through direct assistance for individuals and families. This is a limited amount of flexible funds that can be used to support direct service providers who together meet the locally defined needs of the homeless.

Please see the attached ESG report for the distribution of funds breakdown.

Housing Opportunities for Persons With AIDS

HUD awarded the Tri-State HELP (TS HELP) (3-State) Program a renewal HOPWA grant in 2014, for a three-year funding period, September 1, 2014 through August 30,

2017, for \$1,474,000 of which \$797,663 is distributed to Montana sub-grantees. Additionally, the TS-HELP was awarded a three-year renewal grant for TS HELP Plus for the period of 9/1/2012 through 8/31/2015 for HOPWA Plus in the amount of \$1,484,420 of which \$892,622 is distributed to Montana sub-grantees.

The TS HELP Program provides tenant based rental assistance, emergency assistance, permanent supportive housing and housing coordination services to individuals living with HIV/AIDS in Montana through the management of the Yellowstone AIDS Project (YAP) in Billings and the Open Aid Alliance (OAA) in Missoula. The HOPWA program provides \$200,111 annually for rental assistance and short-term emergency assistance and the HOPWA Plus program provides \$249,703 annually for rental assistance and short-term emergency assistance. OAA and YAP each receive approximately 50% of the funds.

Although the TS HELP/HOPWA Program reports to HUD directly, this report includes a summary of results, below, for the two regions of Montana. Data collected by the YAP and the OAA housing coordinators for the TS HELP and TS HELP Plus grants are presented in the following table.

Montana Progress Report, September 2012 through August 2014		
Total Clients Receiving Services:	139	
Gender:	Male:104	Female: 32
Ethnicity:	Non-Hispanic:.....136	Hispanic: 3
Race:	African/American:.....9	Native American: 13
Recent Living Situation:	Homeless:.....7	Veterans 0
	Detox Center/Incarcerated6	Previous HOPWA 93
Assistance Provided:		
Total # Receiving Short-Term/Emergency Assistance:	48	
Total funds spent on Short-Term/Emergency Assistance.....	\$ 63,355	
Total # Receiving Long-Term (<i>began with LT or moved to LT after being assisted with ST</i>).....	99	
Total funds spent on Long-Term Assistance	\$ 329,250	
Total Funds Spent on Housing Assistance (rental assistance & short-term emergency assistance):\$392,60593		
Outcomes:		
Income producing jobs.....	12	

U.S. Department of Energy and Other Energy Programs

In the plan year ended March 2014, DOE and other funds were used for residential weatherization programs. The funding utilized for residential weatherization came from the following sources:

U.S. Department of Energy	\$ 1,640,408
U.S. Department of Health and Human Services (LIHEAP)	\$ 3,993,426
NorthWestern Energy	\$ 2,347,714
Bonneville Power Administration	\$ 271,910
USB/MDU ²	\$ 234,784
Total	<u>\$8,448,242</u>

Additional funds used to directly assist eligible households with their fuel bills were as follows:

U.S. Department of Health and Human Services (LIHEAP)	\$ 10,948,138
Utility Company Low Income Discount	\$ 5,325,322
Total	<u>\$ 16,273,460</u>

Low Income Housing Tax Credit Program

Since the program's inception in Montana, Commerce has allocated more than \$36.1 million in federal tax credits for 5,556 units of rental housing. For the plan year ending March 31, 2015, Commerce awarded credits to the following projects:

Project(s)	City/Town	Total Project Costs	Tax Credits Awarded
Cedar View Apartments	Malta	\$3,835,107	\$2,534,150
Apsaalooke Warrior	Crow Agency	\$2,788,054	\$2,590,000
Voyageur Apartments	Great Falls	\$7,451,988	\$6,475,000
Sunset Village	Sidney	\$5,930,873	\$5,404,710
Yellowstone Commons	Glendive	\$5,327,460	\$5,000,000
Chippewa Cree Homes I	Rocky Boy's	\$6,371,310	\$4,889,660
TOTAL COSTS		\$31,704,792	\$26,893,220

² Universal System Benefits/Montana Dakota Utilities

I.B.2 FEDERAL SOURCE - LOCAL ADMINISTRATION

U.S. Department of Housing & Urban Development Programs

Continuum of Care

Funds for transitional housing, permanent supportive housing, and rapid rehousing are available on a competitive basis through the state's Continuum of Care process. New and renewal grants awarded for the FY 2014 cycle included the following:

MONTANA'S STATEWIDE CONTINUUM OF CARE HOMELESS ASSISTANCE GRANTS FEDERAL FISCAL YEAR 2014		
Missoula County	SHARE House	\$130,093
Mountain Home Montana, Inc.	B. Hamilton Project	\$69,026
District 7 Human Resources Development Council	Harmony House	\$57,405
The YWCA of Helena, Montana	WINGS Renewal FY 2014	\$35,006
Human Resource Development Council of District IX, Inc.	Amos House	\$17,993
Samaritan House, Inc.	Samaritan House, Inc.	\$56,624
God's Love, Inc.	God's Love FTC	\$128,923
Supporters of Abuse Free Environments (SAFE), Inc.	SAFE Transitional Housing 2011	\$30,588
Northwest Montana Human Resources, Inc.	Courtyard Apartments	\$32,151
Center for Children & Families (Second Chance Homes)	Second Chance Homes	\$22,764
State of Montana	MTHMIS PROJECT 2012 FUNDING	\$60,258
Billings HRDC	Billings CoC RR-Families Renewal App	\$81,601
Kalispell HRDC	Northwest MT RR	\$58,071
YWCA Ada's Place, Missoula	Ada's Place RR	\$153,277
Human Resource Council District XII	HRC Dist XII RR	\$84,833
District IX Human Resource Development Council	HRDC9 Family Housing RR	\$23,913
Montana Department of Commerce	Shelter Plus Care Project	\$195,488
Public Housing Authority of Butte	PHA Butte PSH	\$101,003
Helena Housing Authority	Helena Housing PSH	\$207,688
Housing Authority of Billings	HAB S+C Renewal (15) FY 2014	\$103,354
Missoula Housing Authority	MHA PSH 107 Renewal 2014	\$904,080
Helena H.A. 5 Samaritan (08 App/09 Award)	Helena Housing Samaritan Bonus	\$56,650
MT DoC Statewide (2009app/2010 grant)	Shelter II Renewal 2015	\$37,710
	TOTAL	\$2,648,499

Fair Housing Initiatives Program (FHIP) Grants

In March 2011, HUD awarded \$40.8 million to 108 fair housing organizations and non-profit agencies in 36 states and the District of Columbia to educate the public and combat housing and lending discrimination. Montana received two awards.

In October 2011, HUD awarded funds to 108 fair housing organizations and non-profit agencies around the United States to educate the public and combat housing and lending discrimination.

- Montana Fair Housing, Inc. received an award of \$167,900 under the Private Enforcement Initiative (PEI), which will use its grant to eliminate the impediments to fair housing outlined in Montana's State *Analysis of Impediments*. Activities will include: intake and referral activities, including the referral of meritorious claims to HUD and the mediation of cases; complaint investigation activities including testing and other research activities to identify discriminatory housing practices, and the monitoring of the design and construction of multi-family buildings; educational opportunities for advocates, housing consumers and housing providers; distribution of a list of housing that should be accessible/adaptable for persons with mobility limitations; and work with other organizations serving protected class members to affirmatively further fair housing.

Housing Choice Voucher Family Self-Sufficiency Program (HCV/FSS)

HUD announced in September 2011 that two public housing agencies in Montana will receive \$175,703 to retain or hire service coordinators to work directly with families who participate in HUD's Housing Choice Voucher program. The coordinators will assist these voucher recipients to find employment resources and job training opportunities to put them on a path toward self-sufficiency. These agencies are among nearly 600 that will receive approximately \$60 million in grants. Montana grantees include:

- Housing Authority of Billings \$ 41,049
- Missoula Housing Authority \$ 134,654

HUD's *Housing Choice Voucher Family Self-Sufficiency Program* supports public housing agencies to retain or hire family self-sufficiency coordinators. These coordinators in turn link adults in the HCV program with welfare agencies, schools, businesses and other local partners to develop the skills and experience to enable them to obtain jobs that pay a living wage. The local organizations typically provide participating individuals job training, childcare, counseling, transportation, job placement and homeownership counseling.

Participants in the HCV-FSS program sign a contract that requires the head of the household will get a job and the family will no longer receive welfare assistance at the end of the five-year term. As the family's income rises, a portion of that increased income is deposited in an interest-bearing escrow account. If the family completes its FSS contract, the family receives the escrow funds that it can use for any purpose,

including a down payment on a home, paying educational expenses, starting a business or paying back debts. HUD's Family Self Sufficiency Program is a long-standing resource for increasing economic security and self-sufficiency among participants.

Public Housing Family Self-Sufficiency (PH-FSS) / Resident Opportunities and Self-Sufficiency (ROSS-SC)

The ROSS-SC and PH-FSS programs allow grantees across the U.S. hire or retain service coordinators to work directly with residents to assess their needs to connect them with education, job training and placement programs and/or computer and financial literacy services available in their community to promote self-sufficiency. Only public housing authorities are eligible for PH-FSS grants. ROSS-SC grants can be awarded to public housing authorities, resident associations and nonprofit organizations. Grantees that receive ROSS-SC grants can also use the funding for this purpose, which allows the elderly or persons with disabilities who live in public housing to maintain their independent lifestyle.

- In September 2011, HUD awarded the Missoula Housing Authority (MHA) \$309,000 in grants to help public and assisted housing residents find employment; connect with needed services; and help the elderly and people with disabilities maintain independent living. The funding also allows the grantees to retain or hire "service coordinators" or case workers to work directly with these HUD-assisted families to connect them to the supportive services that meet their individual needs. MHA will receive \$69,000 in PH-FSS funding and \$240,000 in ROSS-SC funding. MHA was previously awarded \$69,000 in FSS funding in May 2011 to hire a coordinator to residents find the needed education, training and ultimately jobs
- In June 2011, HUD awarded a total of \$579,000 to Fort Peck Housing Authority, Inc. (\$201,000), Northern Cheyenne Tribal Housing Authority (\$168,000), and Salish & Kootenai Housing Authority (\$210,000).

Rural Innovation Fund

Three tribal communities in Montana received \$2.9 million in grants to address distressed housing conditions and concentrated poverty. The grants from HUD's new *Rural Innovation Fund* promote an "entrepreneurial approach" to affordable housing and economic development in rural areas.

- The Chippewa Cree Tribe will use their award to construct a water storage and delivery system that will provide potable water and fire suppression to the community (justice center, health clinic and approximately 200 homes). This project will result in the creation of 21 jobs.
- The Northern Cheyenne Tribal Housing Authority will use their grant to rehabilitate 21 houses, raising their standards for safety, energy efficiency, and accessibility. These efforts will result in a 10 percent reduction in substandard housing for the community.

- The Salish & Kootenai Housing Authority (SKHA) will purchase foreclosed properties that can then be re-sold at more affordable prices. The funding will also provide homebuyer education, credit counseling, financial assistance and affordable housing options. Additionally, the funds will help the CS&KT tribal credit program with the purchase and renovation of foreclosed properties to which they hold title.

Tribal Colleges and Universities Program (TCUP)

Native American colleges and universities receive HUD TCUP funds to expand, renovate, and equip their own facilities, to improve student housing, and to support construction of new facilities. Most of these institutions serve remote areas and a growing number of local residents depend heavily on the education, counseling, health, and employment services they offer. In September 2010, three Montana Tribal colleges received \$2.4 million.

- Salish Kootenai College (SKC) intends to use its TCUP grant to construct a teacher education building. In only four years, SKC teacher education has grown from one to three bachelor's degrees, from four to nine faculty positions, and from 52 to 246 students. By 2012, the college anticipates hiring two additional faculty members to meet the projected enrollment of 300 students. The project will serve the 7,739 low- and moderate-income Native American community members of the Flathead Indian Reservation.
- Stone Child College (SCC) intends to use its TCUP grant to implement its Capacity Enhancement and Rehabilitation project. This project will benefit primarily low- and very low-income American Indian students, families, and children on the Rocky Boy's Indian Reservation through the construction or rehabilitation of several facilities. These efforts will address the current and pressing need to offer culturally appropriate, socially relevant, high-quality education and services to the Chippewa Cree Tribal members, including their children, on Rocky Boy's Indian Reservation.
- Fort Peck Community College (FPCC) intends to use its TCUP grant to construct a combined library, information technology, and community learning center. Expansion and construction of this campus facility has been a goal in FPCC's long-range plan, as the current library, learning center, and computer labs at FPCC's main campus in Poplar are too small for the increasing usage by the 500 FPCC students, primary and secondary school students, and community members. The facility will address the absence of adequate educational research and technological communication opportunities found in isolated, low-income communities. This facility will enhance student, faculty, staff, and the reservation community's access to both educational and community service opportunities by providing library services, information technology access, Tribal archival documents, and learning space.

Capital Fund Education and Training Community Facilities (CFCF) Program

HUD's *Capital Fund Education and Training Community Facilities Program* provides funding to public housing authorities for the construction, rehabilitation, or purchase of

facilities that will offer early childhood education, adult education and job training programs. Although designed primarily for public housing residents, residents in the surrounding community can also utilize CFCF funds. The purpose of the facilities is to offer comprehensive, integrated education and employment services to help public housing residents achieve long-term economic self-sufficiency.

HUD awarded \$576,479 to the Helena Housing Authority (HHA) in May 2011 to create a center for early childhood education and adult job training for public housing residents. HHA was one of only 10 successful applicants across the country. The grant award will provide seed money to construct a 4,500 square foot facility on a site owned by the housing authority. Local partners include Head Start, the University of Montana - Helena College of Technology and the Career Training Institute.

Housing Counseling Program

As part of its continuing effort to help families find decent housing and to prevent future foreclosures, HUD announced \$145,194 in housing counseling grants to two organizations in Montana on March 16, 2012. Because of this funding, Montana households will have a greater opportunity to find housing or keep their current homes.

➤ MBOH, Helena.....\$119,546

➤ Human Resource Development Council, District IX, Bozeman.....\$ 25,648

This year's HUD grant will provide rental, emergency housing and homeownership assistance to the HRDC's customers through individual and group counseling and education. Services provided include: pre-purchase homeownership education and counseling; mortgage delinquency prevention; post-purchase counseling; counseling to locate or maintain affordable rental housing; and services for homeless persons. Services will be provided in the three Southwest Montana counties served by the HRDC to low and moderate income households.

Emergency Homeowners Loan Program (EHLP)

In June 2011, HUD in conjunction with NeighborWorks® America announced the launch of the Emergency Homeowners' Loan Program to help homeowners who are at risk of foreclosure in Montana. Congress provided \$1 billion dollars to HUD, as part of the Dodd-Frank Wall Street Reform and Consumer Protection Act, to implement EHLP. The program will assist homeowners who have experienced a reduction in income and are at risk of foreclosure due to involuntary unemployment, underemployment, due to economic conditions or a medical condition. HUD allocated \$5.7 million to fund this emergency loan program in Montana. Under EHLP program guidelines eligible homeowners can qualify for an interest free loan that pays a portion of their monthly mortgage for up to two years, or up to \$50,000, whichever comes first. The EHLP program will pay a portion of an approved applicant's monthly mortgage including

missed mortgage payments or past due charges including principal, interest, taxes, insurances, and attorney fees.

Public Housing Capital Fund Program

In July 2011 and February 2012, HUD awarded public housing authorities in Montana \$2,960,559 and \$2,574,655, respectively, that will be used to make major large-scale improvements to their public housing units. The grants are provided through HUD's Capital Fund Program, which provides annual funding to all public housing authorities to build, repair, renovate and/or modernize the public housing in their communities. This funding can be used to make large-scale improvements such as new roofs and to make energy-efficient upgrades to replace old plumbing and electrical systems. The following housing authorities in Montana will receive this funding:

	7/12/2011 Awards	2/10/2012 Awards
Housing Authority of Billings	\$398,395	\$367,014
Great Falls Housing Authority	\$805,479	\$690,034
Housing Authority of Butte	\$429,725	\$368,135
Helena Housing Authority	\$502,219	\$462,661
Housing Authority of the City of Anaconda	\$217,022	\$193,945
Richland County Housing Authority	\$109,659	\$98,956
Housing Authority of Glasgow	\$81,552	\$73,371
Whitefish Housing Authority	\$54,894	\$49,157
Dawson County Housing Authority	\$27,728	\$26,529
Missoula Housing Authority	\$333,886	\$244,853
TOTAL	\$2,960,559	\$2,574,655

Sustainable Regional Planning Grant

HUD's Regional Planning Grant program encourages grantees to support regional planning efforts that integrate housing, land-use, economic and workforce development, transportation, and infrastructure developments in a manner that empowers regions to consider how all of these factors work together to create more jobs and economic opportunities. The program will place a priority on partnerships, including the collaboration of arts and culture, philanthropy, and innovative ideas to the regional planning process. Recognizing that areas are in different stages of sustainability planning, HUD has established two categories for the Regional Planning Grant program. The first supports communities that are beginning the conversation about how best to align their housing, transportation, environment, and other infrastructure investments. The second recognizes that some communities have already achieved significant momentum and are prepared to move toward completion and implementation of regional plans for sustainable development.

- **Opportunity Link** received **\$1,500,000** to develop the *North-Central Montana Regional Planning for Sustainable Development*. This process engaged regional governments, planners, stakeholders and residents throughout a 36-month period to develop a high road approach to emerging jobs and contracts, and a series of baseline and benchmark metrics that can guide evaluation of progress. Opportunity Link will provide GIS-based scenario planning, training in comprehensive sustainable plan, and one-on-one follow-up technical assistance to government planning offices. Opportunity Link will provide training opportunities throughout the project period with current data and new resources made available to residents, organizations and planners online through the North-Central Montana Sustainable Communities Clearinghouse.

Core Partners: Cascade County, Teton County, Chouteau County, Toole County, Glacier County, Blackfeet Indian Reservation, Hill County, Fort Belknap Indian Reservation, Judith Basin County, Rocky Boy's Indian Reservation, Liberty County, City of Great Falls, Great Falls MPO, Phillips County, City of Havre, and Pondera County.

I.B.3 STATE SOURCE - STATE ADMINISTRATION

Montana Department of Natural Resources and Conservation

Renewable Resource Grant and Loan Program

The RRGL program provides financial assistance to local governments in the form of grants up to \$125,000 or loans to secure loans for water and sewer projects. The funding for RRGL programs is \$4 million each biennium. The following table illustrates the Renewable Resource Grants monies approved in past legislative sessions.

RENEWABLE RESOURCE GRANT FUNDS	
Total Infrastructure, Planning and Emergency Grants	
Biennium	Total Grant Awards
2015	\$8,967,632
2013	\$6,260,000
2011	\$8,654,593
2009	\$7,658,596

Montana Department of Commerce

Community Development Division

Treasure State Endowment Program (TSEP)

The TSEP program provides financial assistance to local governments in the form of a grant up to \$750,000 for water and sewer projects. TSEP is commonly leveraged for infrastructure projects and emergency projects in communities across Montana. The following table illustrates the TSEP grants available in past biennial program years.

Project Grants

Treasure State Endowment Program		
Project Grants by Biennium		
	Project Type	Amount Awarded
2015 Biennium	Infrastructure	\$33,983,538
2013 Biennium	Infrastructure	\$30,635,122
2011 Biennium	Infrastructure	\$32,623,541
2009 Biennium	Infrastructure	\$32,631,715

Infrastructure Planning Grants

Treasure State Endowment Program		
Planning Grants by Biennium		
	Project Type	Amount Available for Award
2015 Biennium	Infrastructure Planning Grants	\$900,000
2013 Biennium	Infrastructure Planning Grants	\$900,000
2011 Biennium	Preliminary Engineering Report	\$900,000
2009 Biennium	Preliminary Engineering Report	\$900,000

Emergency Grants

Treasure State Endowment Program		
Emergency Grants by Biennium		
	Project Type	Amount Available for Award
2015 Biennium	Emergency Grant	\$100,000
2013 Biennium	Emergency Grant	\$100,000
2011 Biennium	Emergency Grant	\$100,000
2009 Biennium	Emergency Grant	\$100,000

Quality Schools Facility Grant Program

The Quality Schools program provides grants to K-12 school districts (as defined in 20-6-701, MCA) for school facility projects, planning and emergency projects in communities across Montana. The following table illustrates the Quality Schools grants available in past biennial program years.

Project Grants

Quality Schools Grant Program		
Project Grants by Biennium		
	Project Type	Amount Available for Award
2015 Biennium	School Facility Grants	\$11,418,642
2013 Biennium	School Facility Grants	\$10,606,964
2011 Biennium	School Facility Grants	\$11,069,265

Planning Grants

Quality Schools Grant Program		
Planning Grants by Biennium		
	Project Type	Amount Available for Award
2015 Biennium	Planning Grants	\$900,000
2013 Biennium	Planning Grants	\$900,000
2011 Biennium	Planning Grants	\$900,000

Emergency Grants

Quality Schools Grant Program		
Emergency Grants by Biennium		
	Project Type	Amount Available for Award
2015 Biennium	Emergency Grants	\$100,000
2013 Biennium	Emergency Grants	\$100,000
2011 Biennium	Emergency Grants	\$100,000

Coal Board Funding

The Coal Board funding provides financial assistance to local governments, school districts, state agencies, and tribal governments with the impacts that are a direct consequence of coal development or because of major decline in coal-related activities in the form of a project grant up for facility or planning projects. The following table illustrates the Quality Schools grants available in past biennial program years.

Project & Planning Grants

Coal Board Funding		
Project & Planning Grants by Biennium		
	Project Type	Amount Available for Award
2015 Biennium	Project & Planning Grants	\$3,918,811
2013 Biennium	Project & Planning Grants	\$5,917,424
2011 Biennium	Project & Planning Grants	\$5,736,643
2009 Biennium	Project & Planning Grants	\$2,000,000

Montana Distressed Wood Products Industry Recovery and Stabilization (WPIRS) Program

For calendar year 2014, the WPIRS Program received no applications for either the State program or EDA program.

Montana Board of Housing

Homeownership Mortgage Revenue Bond Program

During the period of April 1, 2014 to March 31, 2015, MBOH provided 304 loans totaling more than \$36,839,009 to homeowners. These loans consisted of first mortgages and down payment assistance loans, with an average loan amount of about \$135,300, and the average down payment assistance loan of \$5,236. The average income of the homeowners was \$48,118.

Mortgage Credit Certificate Program

For the period of April 1, 2014 to March 31, 2015, MBOH provided 137 Mortgage Credit Certificates to homebuyers. The loans totaled \$24,433,539 for families with an average household income of \$49,157.

Set-aside Homeownership Mortgage Program (including Disabled Accessible Affordable Homeownership Program providing affordable, architecturally-accessible homes for people with disabilities in order to promote independent living.)

During the period of April 1, 2014 to March 31, 2015, MBOH provided 16 loans totaling \$1,400,184 to lower income homeowners. The average income of the homeowners was \$29,438.

Montana House™

Twelve Montana House™ homes have been completed since April 2005. Four of the homes have been located in Great Falls. One house was moved onto the Blackfeet Reservation during the summer of 2006. Another was sold to the Habitat for Humanity of Anaconda. MBOH and the Blackfeet Housing Authority signed an agreement that allows the Housing Authority to produce Montana House™ units for use on the Blackfeet Reservation, providing needed housing units and training students in construction skills, and completed two homes recently sold. The Miles City Community College, located in the eastern part of the state, completed two homes, which were sold locally. The Fort Belknap College has built and sold two homes.

Risk Sharing, General Obligation Bond, and Conduit Bond Programs

No new projects were funded during the plan year through the Multifamily Risk Sharing, General Obligation, or Conduit Bond programs.

Reverse Annuity Mortgage Loan Program

For calendar year 2014, four RAM loans closed. The program has assisted 193 senior households since it began taking applications.

Housing Montana Fund

During the period of April 1, 2014 to March 31, 2015, there were no TANF loans closed for the single-family assistance program. These loans, done in partnership with NeighborWorks Montana, provide soft second and third mortgages to lower income households purchasing a home. The households must qualify under TANF rules and must complete a first-time homebuyer training course.

Organizations eligible for loans from the revolving loan fund are state and local governments, state agencies or programs, tribal governments, local housing authorities, nonprofit community or neighborhood-based organizations, regional or statewide nonprofit housing assistance organizations, or for-profit housing developers. All interest and principal on loans, which have a 30-year term, must be repaid to the loan fund. Once loans pay off, funds are recycled for use in new loans. There was one revolving loan for \$327,660.00 closed during the period of April 1, 2014 to March 31, 2015.

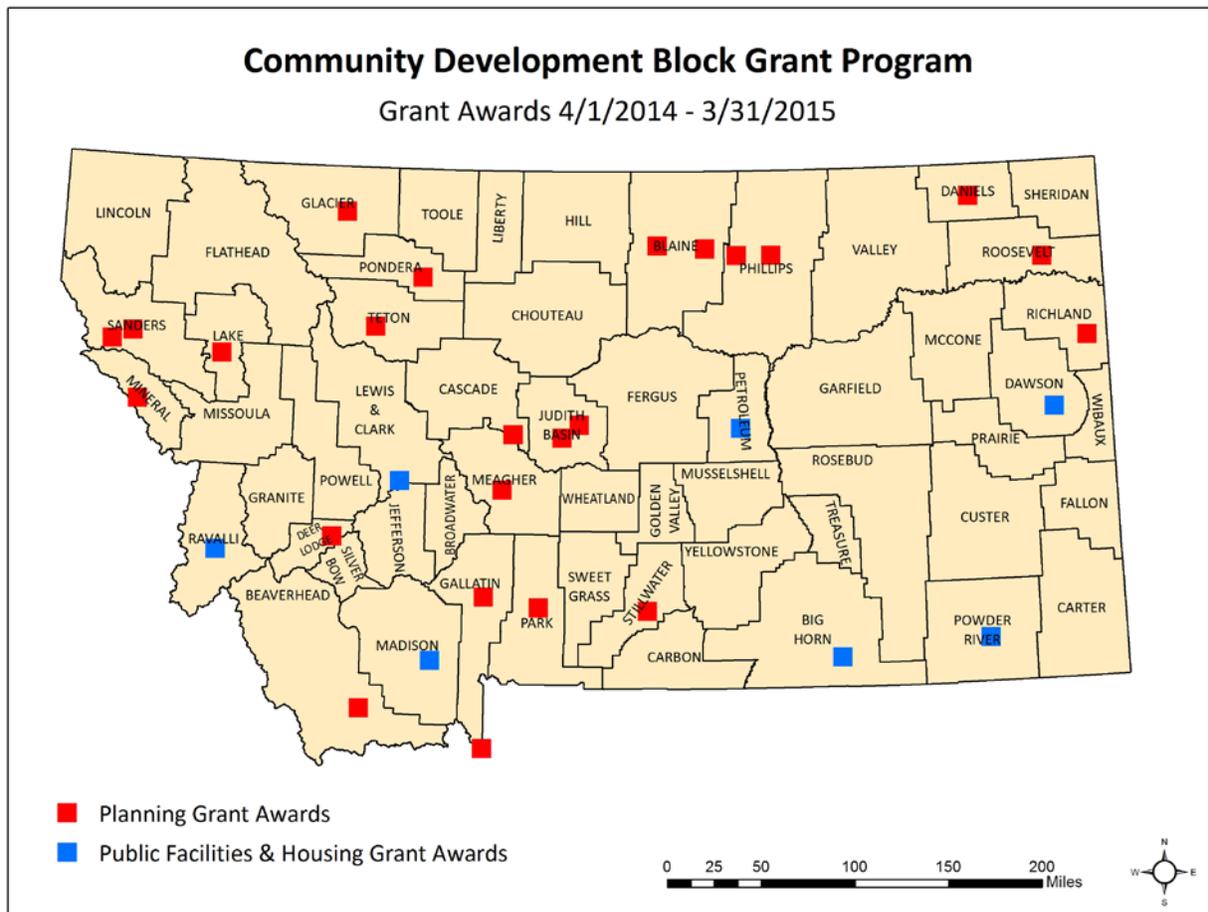
I.B.4 GEOGRAPHIC DISTRIBUTION AND LOCATION OF INVESTMENTS

Housing and community development needs vary widely across Montana. The extreme diversity in available housing, age of housing stock, and overall range in population density complicate the assessment of the type and degree of housing and community development needs. MDOC programs are generally implemented on a statewide competitive basis. Entities receiving CDBG and HOME funds must have previous allocations substantially drawn down before they are eligible to apply for additional funds from these programs. This method has shown to disburse funds equitably throughout the state, allowing all groups an equal chance to apply for funds. Together, all funding methods, whether through a formula, as in the ESG grants, or competitive, as in CDBG and HOME grants, tend to be widely distributed throughout the state.

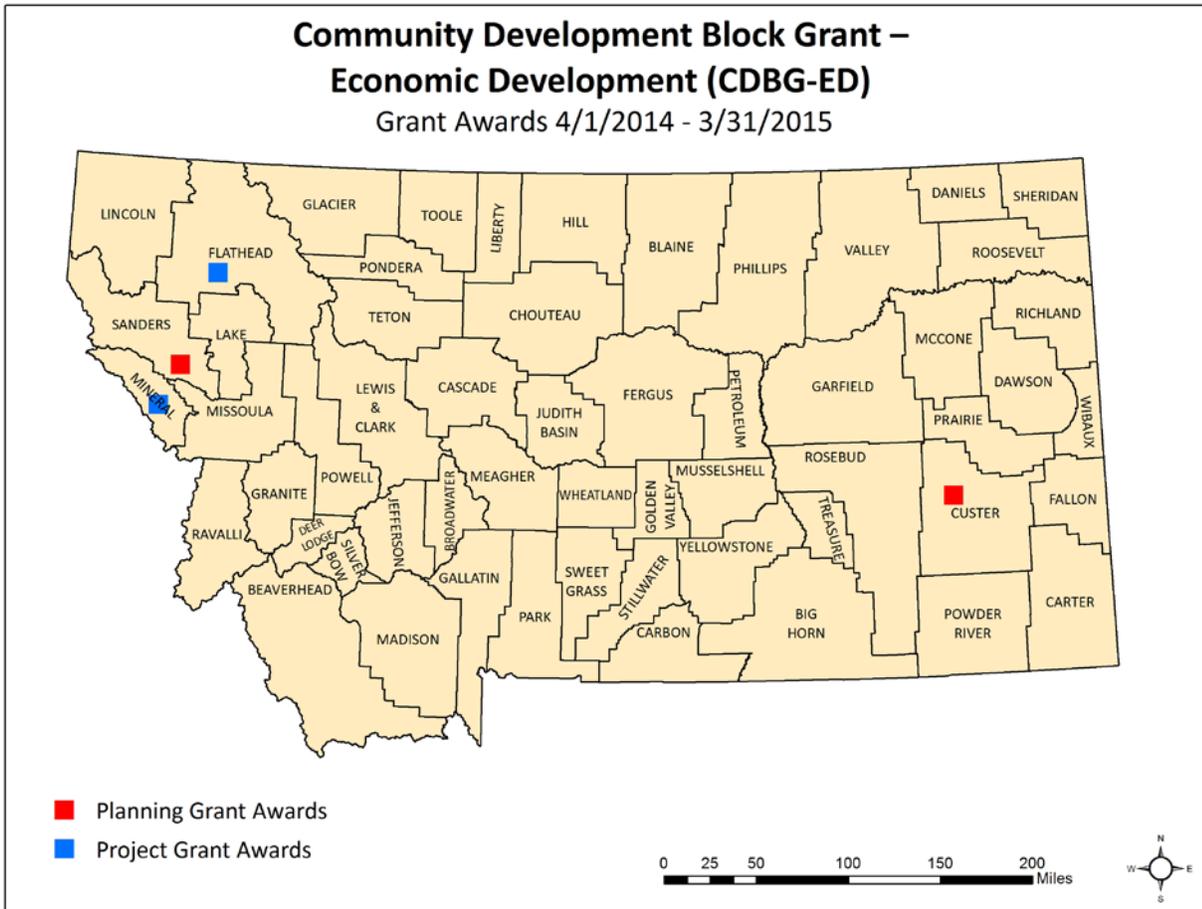
Maps

In order to view the geographic dispersion of the past year's funding activities for CDBG and HOME, geographic maps have been prepared, in addition to maps showing service areas for other programs.

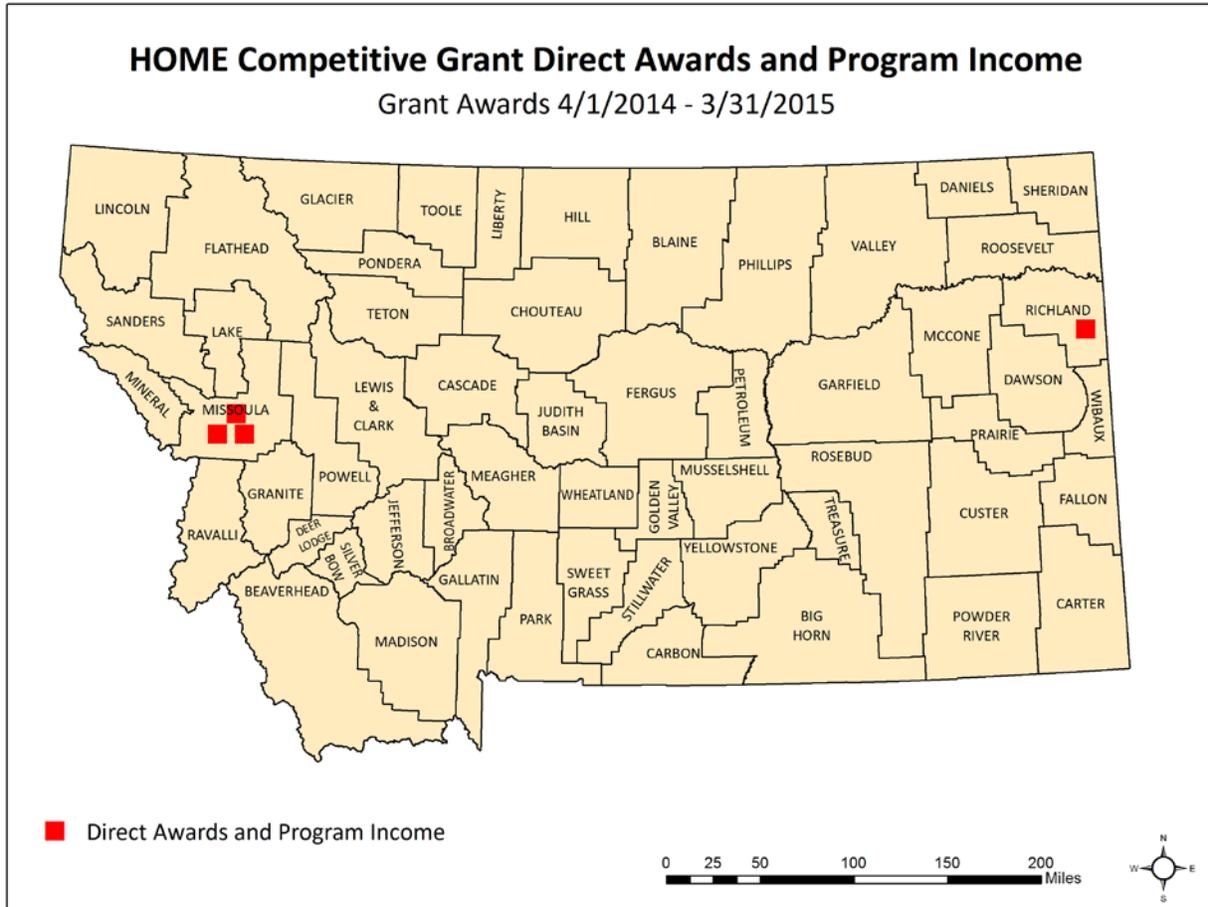
CDBG Public Facilities and Housing Rehabilitation Project and Planning Grant Awards
April 1, 2014 – March 31, 2015 (map below)



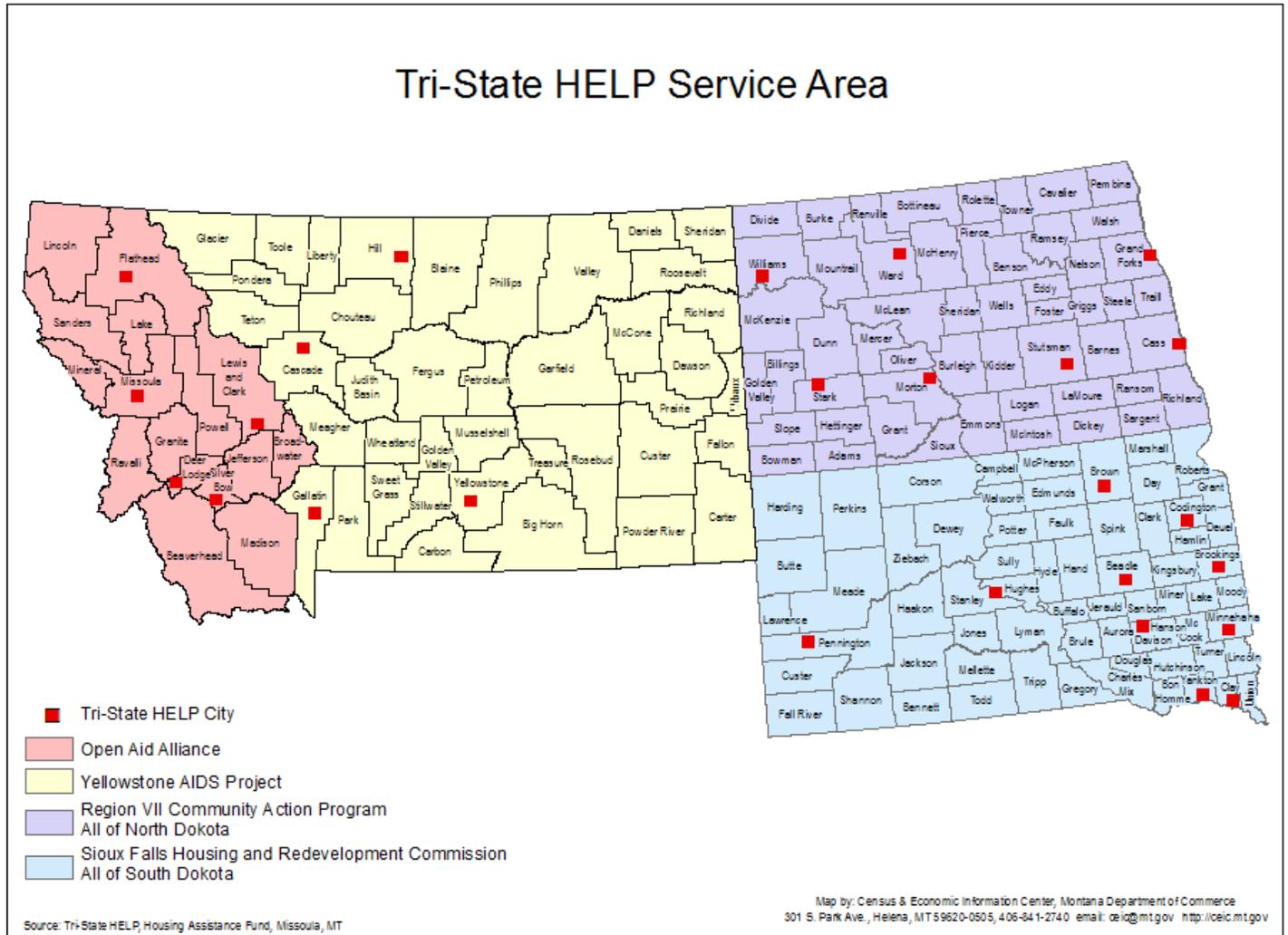
FY 2014 CDBG Economic Development Project Awards



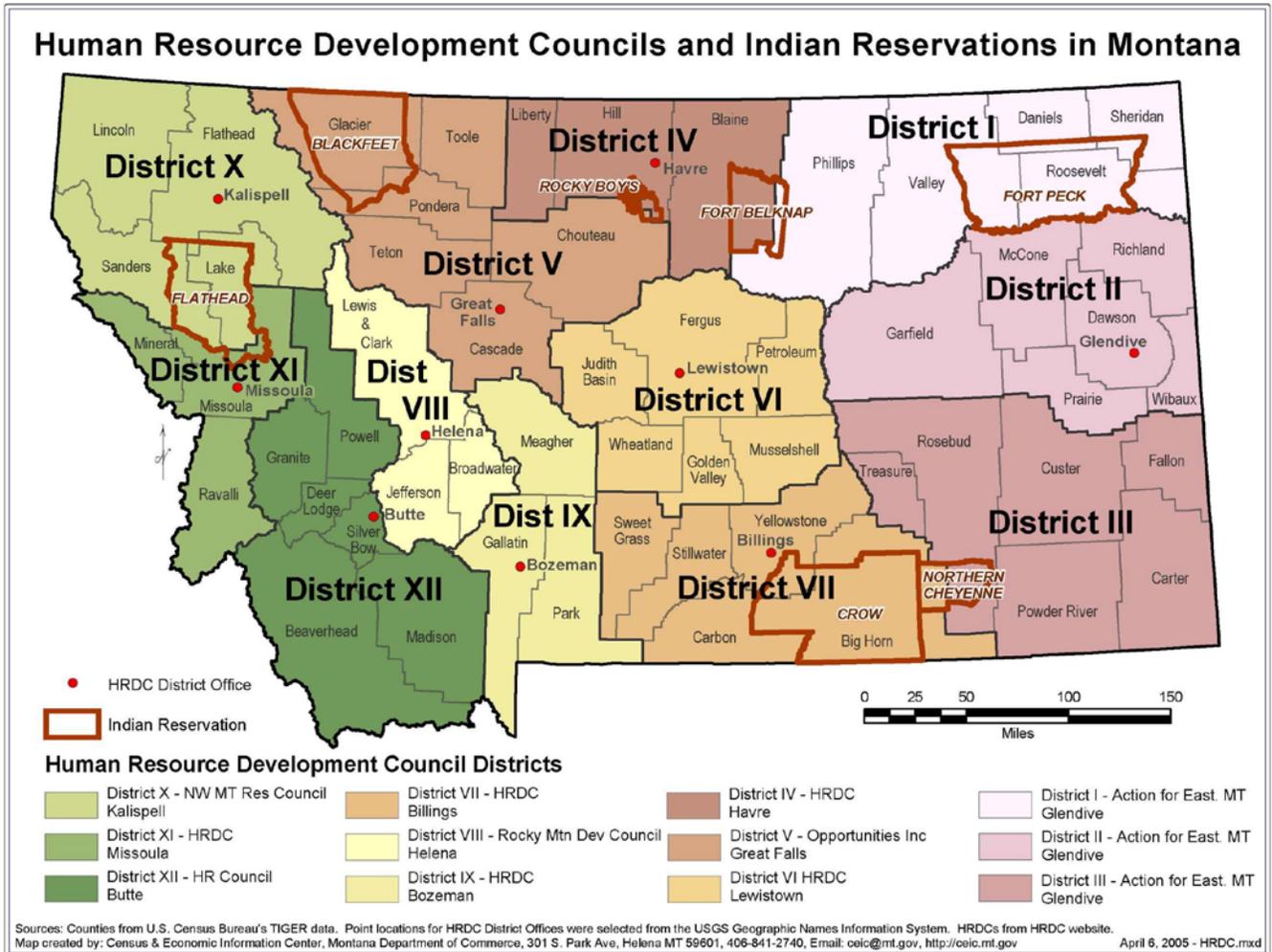
HOME Program FFY 2014 Competitive Awards



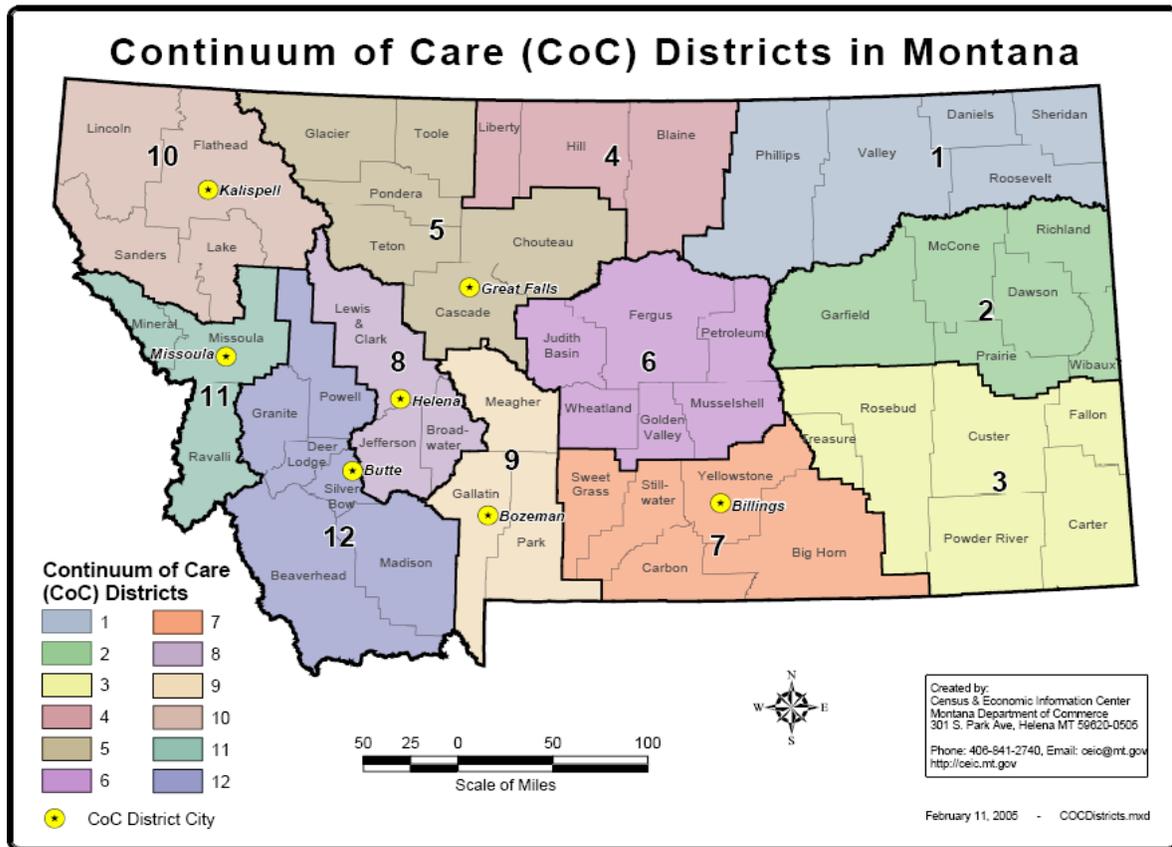
Tri-State HELP Service Area



Human Resource Development Councils and Indian Reservations in Montana



Continuum of Care Districts in Montana



I.B.5 PATTERN OF PLANNED VERSUS ACTUAL INVESTMENT

According to the previously discussed method of distribution, Commerce allocated CDBG funds as planned between the Business Resources Division for Economic Development projects, (including planning grants), and the Community Development Division for Public Facility and Housing and Neighborhood Renewal projects, also including planning grants.

The HOME program carried out its competitive ranking and awarded funds through the non-competitive program as planned in the 2014 Annual Action Plan.

ESG funds were allocated to the 10 regional HRDCs according to the formula allocation contained in ARM 53-10-502 pertaining to the federal Community Services Block Grant. This allocation reflects areas of poverty and general population. HRDCs receive 85% of the ESG funds the state receives from HUD.

I.B.6 LEVERAGING AND MATCHING FUNDS

The CDBG-ED program is a major player in economic development financing in Montana. The measures of success for the program are the number of jobs created, the leveraging of other funding to complete project financing, and amounts repaid to local revolving loan funds. Economic development projects have leveraged U.S. Small Business Administration (SBA) programs, Economic Development Administration local revolving loan funds, and the USDA RD Intermediary Relending Program (IRP). Economic development projects have also leveraged state programs such as the Montana Board of Investments and the Montana Department of Agriculture's Growth through Agriculture. Most economic development projects leverage private funding from local banking institutions and/or provide owner equity to match CDBG funds.

The CDBG-ED program requires a minimum 1:1 match; i.e., one non-CDBG dollar for each dollar of non-administrative CDBG funds requested. During the past program year, \$407,470 of CDBG-ED funds was matched with \$1,202,839 of other funding; i.e., each CDBG-ED dollar was leveraged by over \$ 1.95 in public and private funding. Based on the past five years, CDBG-ED funds have leveraged over 7 times the amount available for awards. On average, over the last five years \$9,619,201 of CDBG-ED funds leveraged \$74,194,772 in other funds from public and private sources.

The CDBG Public Facilities and Housing categories leverage funds from other local, state and federal grant and loan sources. In the Public Facilities category of the CDBG program, local governments must provide a 25% match of total CDBG funds requested. Match is not required for CDBG Housing projects. During the plan year ending March 31, 2015, CDBG public facility and housing funds leveraged \$5,497,076 from other funding sources.

HOME funds used for project activities must include match at 25%. During plan year 2014, the HOME program incurred a match liability of \$366,389.60, with a total match contributed of \$244,572. Montana has excess match from prior federal fiscal years totaling \$7,172,288 therefore, the matching requirement has been reduced by the HOME program to 5%.

The estimated total cost of the competitively awarded projects in the plan year, including \$2.2 million of HOME funds, was more than \$9.7 million, providing more than \$4.40 for every \$1 of HOME funds.

The ESG program verifies required match is reported annually by contracted agencies. The ESG match is only required above the first \$100,000. Please see ESG attachment for details.

I.B.7 PROJECT MONITORING

HOME Program

HOME staff conducts monitoring visits to each project to determine compliance with housing codes and applicable HUD regulations and Commerce policies. Project monitoring is based on a guide found in the HOME Administration Manual. Key issues include assessment of affirmative marketing actions, outreach to minority and women owned businesses, data on the amount and use of program income, number of projects, and eligibility of tenants and homebuyers, rent levels, purchase prices, and compliance with subsidy limits. Following the monitoring visit, staff provides a written letter to the grantee indicating any issues or findings identified. The grantee must to respond to any issues or findings. During plan year 2014, no unresolved findings were issued.

Homebuyer and rental grantees provide annual certifications to the HOME program. Certifications require homebuyer grantees to verify either that homes are continuing to be used as the principal residences of participants, or if transfer of the property has occurred, that program income has been recaptured and accounted for. All rental projects must certify that inspections for housing quality standards are complete and that affordability requirements regarding income and rent limits have been met.

In addition, rental projects received on-site visits. The HOME program staff schedules on-site visits for rental projects every year for projects with 26 or more units, every 2 years for projects with 5 to 25 units, and every 3 years for projects with 1 to 4 units. These on-site visits allow staff to verify that tenant income certifications, rental agreements, rent limits, and inspection results meet HUD and MDOC requirements. Staff also reviews the facility's condition to ensure that it remains safe, decent, and sanitary.

CDBG Program

Many CDBG projects received an on-site monitoring visit during the plan year. A basic requirement of the Montana CDBG program—Housing, Public Facilities, and Economic Development—is for state program staff to monitor the critical elements of each project at least once. CDBG operates under a comprehensive monitoring system, meaning that staff reviews elements of the local CDBG project in sixteen different areas. Within each of these areas, staff completes an extensive checklist, reviewing each project element for compliance with all applicable, federal, and state program requirements. Following the monitoring visit, staff issues a formal letter to the chief elected official of the local government reporting on the monitoring visit, noting any findings as may be applicable, and asking the local government to respond promptly.

In addition to the on-site monitoring visits during the year, CDBG staff monitors each project through regular contacts with the local project manager and through written quarterly and drawdown progress reports. These reports provide information and

updates concerning project activities and progress on objectives from start-up through closeout of the project.

ESG Program

The HRDCs prepare an annual work plan for the use of ESG grant funds. The process ensures they review the needs of their service area and establish funding for specific activities, including the required matching funds. Public Health and Human Services provides on-site monitoring of the ESG program once a year by program staff using a monitoring tool and year round training and technical assistance as needed. Staff reviews the matching requirements, budget, and performance (both financial and operational) against contracted activities in the approved ESG work plans. Staff reviews fiscal accountability and timeliness of report submission. This monitoring is part of a comprehensive annual review of all programs funded by the Intergovernmental Human Services Bureau. HUD reviews the ESG program periodically.

SECTION C - AFFIRMATIVELY FURTHERING FAIR HOUSING

I.C.1 SUMMARY OF IMPEDIMENTS TO FAIR HOUSING CHOICE

In the Fair Housing Act, the United States prohibits any person from discriminating in the sale or rental of housing, the financing of housing, or the provision of brokerage services, including in any way making unavailable or denying a dwelling to any person, because of race, color, religion, sex, national origin, handicap, or familial status. Montana law (Section 49, parts 2 and 4, MCA) also defines illegal housing discrimination and includes age and marital status as protected classes.

According to HUD, impediments to fair housing choice include actions or omissions in the state that constitute violations of the Fair Housing Act. Further, impediments mean actions or omissions that are counter-productive to fair housing choice or that have the effect of restricting housing opportunities based on protected classes.

Commerce is responsible for conducting the Analysis of Impediments (AI), taking actions to address the impediments within its jurisdiction, and monitoring the results of those actions, and certifying HOME and CDBG grantees affirmatively further fair housing.

Analysis of Impediments

The Analysis of Impediments for the State of Montana has uncovered several issues that can be considered barriers to affirmatively furthering fair housing and, consequently, impediments to fair housing choice. These are as follows:

- Lack of knowledge of fair housing and fair housing law;
- Lack of sufficient fair housing outreach and education;

- Ineffective use of current system capacity;
- Lack of effective referral system;
- Confusion about fair housing, affordable housing and landlord/tenant issues;
- Disproportionately high denial rates for racial and ethnic minorities;
- Denial rates disproportionately higher in lower-income areas, especially, American Indian lands;
- Lack of an organization receiving fair housing funding from HUD for outreach education, testing or enforcement.

In its latest Analysis of Impediments³, Commerce has identified actions to be taken in response to the identified impediments. The actions are presented by approach and include education and coordination objectives, as follows:

1. Education Objectives

- Partner with the Montana Department of Labor and Industry, Human Rights Bureau to:
 - Expand outreach and education of fair housing law to improve public understanding,
 - Design, promote and provide fair housing education to improve and enhance understanding of affirmatively furthering fair housing for specific groups including, but not limited, to:
 - Consumers, including Native Americans and Hispanics
 - Housing providers, including program managers, builders, architects and unregulated property managers
 - Real estate agents and lender/bankers
 - General citizenry throughout the state, especially people in rural areas of the state
 - Units of local government, including zoning and planning personnel, building code inspectors, and elected officials to communicate the obligations of affirmatively furthering fair housing and, common public administrative procedures used to affirmatively further fair housing
 - Educate housing developers, builders and other housing providers about accessibility and visit-ability
- Explore the feasibility of partnering with the Montana Financial Education Coalition to provide homebuyer training at the secondary education level,

³ 2009 Analysis of Impediments to Fair Housing Choice; Western Economic Services, LLC; December 2009; <http://housing.mt.gov/content/CP/docs/CPDocsAndRpts/CPAI10.pdf>

- Explore ways to enhance current first-time homebuyer programs, including communicating how credit works, how to avoid credit problems, how to identify predatory lending and the attributes of a predatory loan,
- Continue to publish and distribute fair housing educational materials and guides.

2. Coordination Objectives

- Through the Commerce's Housing Coordinating Team, establish a fair housing subcommittee, which would have an advisory group that includes landlords, bankers, attorneys, Realtors[®], and others, to:
 - Review fair housing efforts and develop methods to provide better outreach and education that meets the needs of these groups,
 - Research best practices for affirmatively furthering fair housing by units of local government, particularly zoning and land use practices and building codes,
 - Develop a list of objectives to recommend to communities that have received, or may receive, HUD-funded housing and community development programs,
 - Review the feasibility of units of local government adopting fair housing ordinances and coordinating these ordinances with the Montana Department of Labor and Industry and Human Rights Bureau.
- Increase the Commerce's role as an information clearinghouse by including additional information on the Housing Division web site including Montana landlord/tenant law, federal and Montana fair housing laws, and Americans with Disabilities Act and Section 504 design and construction standards.
- Explore a partnership with Montana Department of Labor and Industry, Building Codes Bureau to develop methods to educate builders, developers, inspectors, planners, and architects about accessible housing design and construction requirements.
- Support the efforts of the Montana Department of Labor and Industry, Human Rights Bureau to seek substantially equivalent status with HUD.
- Coordinate educational efforts with the HUD and the Montana Department of Labor and Industry and Human Rights Bureau.

Other Efforts and Outreach Activities

Commerce has been involved in various other educational efforts and outreach activities to affirmatively further fair housing during the plan year. These efforts and activities are summarized below.

- Commerce's Housing Coordinating Team has established a Fair Housing Advisory Subcommittee that meets several times a year and currently includes representatives from the following associations: Lenders, Real Estate Professionals,

Property Management Professionals, Program Compliance Professionals, Site Managers, Property Owners, Landlords, Non-Profit Housing Organizations, and Developers of Affordable Housing. This group works collaboratively to expand knowledge of Fair Housing, using the results from the Analysis of Impediments to form immediate priorities, as well as long term goals.

- The Montana Board of Housing and Housing Division provides a list of “housing rights, fair housing advocates, legal assistance, and other resources” available in the state as a “featured resource on its web page:

<http://housing.mt.gov/content/FAR/docs/HousingRightsTable.pdf>

- Originally developed as a component of the *Montana Housing Resource Directory*⁴, the listing provides basic information on where citizens can find assistance for issues relating to housing rights, fair housing, legal issues, etc.⁵
- For any person in Montana with any disability who is searching for rental housing, the MTHousingSearch.com website, sponsored and paid for by Commerce, has made the search much easier. When entering the search criteria, using the Accessible tab, there are over 20 commonly desired physical characteristics for a house or apartment that helps narrow the search immediately to a smaller subset, thus enabling anyone to find the perfect rental home for their unique needs.

Socialserve.com, which hosts the web site, has demonstrated, with their work on the MTHousingSearch.com website, a commitment to seeking out national standards and best-practices regarding the design of web pages that can be used by persons with disabilities (i.e., people who use ‘screen readers’).

- Commerce provides copies of the “Analysis of Impediments” at the housing application workshops and Consolidated Plan meetings and supplies copies to individuals and organizations requesting them. The AI is also available on the web site: <http://housing.mt.gov/content/CP/docs/CPDocsAndRpts/CPAI10.pdf>
- Commerce provides brochures and posters distributed by the Montana Department of Labor and Industry Human Rights Bureau to grantees and as requested by individuals and organizations. Commerce also makes the brochures and posters available at workshops and other events. The brochures are also available on HRB’s website: <http://erd.dli.mt.gov/human-rights/montana-human-rights-laws/housing-discrimination.html>. During Fair Housing Month, Commerce has also publicized the availability of multi-lingual Fair Housing posters to a list of over 500 individuals, nonprofit entities or local governments and for-profits to encourage the display of fair housing information.

⁴ *Montana Housing Resource Directory*, Montana Department of Commerce, September 2011; <http://housing.mt.gov/content/FAR/docs/HousingResourceDirectory.pdf>

⁵ The material included in the directory is not intended as legal advice or as a promotion or guarantee of the reliability or appropriateness of programs, businesses and individuals listed or linked. In certain instances, readers of the directory may want to consult with legal counsel. MDOC assumes no liability for the content of information provided in the directory or the content of links listed in the directory.

- Households can apply online for the Section 8 waiting list from any location that has internet access, including public libraries, public assistance offices, etc.
- The HOME and CDBG programs provide fair housing information and program requirements in its application guidelines and administration manual. Grant recipients are required to show efforts to further fair housing, and each of the programs' staffs monitor recipients for compliance.
- Native American Tribal Progress towards Impediments
 - Montana has seven Indian tribes. The State provides funding for the Indian Country Economic Development (ICED) Program, State Tribal Economic Development Commission (STED), and the tribal Entrepreneur Program. With the assistance of these state-funded programs, and efforts generated within the tribes, steps are being take to address impediments to fair housing and economic development. A summary of some targeted efforts to assist tribal members is described below. Establishing credit, credit counseling, and business ownership are all efforts to build wealth and home ownership.
- **LEGAL/FINANCIAL INFRASTRUCTURE DEVELOPMENT:** The ICED Program and the STED Commission have worked with tribal governments and the Federal Reserve Minneapolis Branch of Community Development to assist tribes in accessing the Uniform Law Commission and its resources to enact the Tribal Model Secured Transactions Act and Uniform Commercial Codes (UCC). Two tribal governments, the Crow Nation and the Chippewa Cree Tribe, have enacted Tribal Secured Transactions Acts and developed lien filing systems with the Montana Secretary of State's Office to perfect security interest in collateralizable assets. This legal/financial infrastructure development addresses business finance risk barriers by allowing for a greater uniformity in financial transactions in these tribal communities, thus encouraging greater business development activity in these areas.
- **PHYSICAL INFRASTRUCTURE DEVELOPMENT:** ICED funds have been used by some tribal governments (Confederated Salish & Kootenai Tribes, Northern Cheyenne, and Blackfeet) to identify, map and plan for commercial, residential, and industrial zoning within their communities, as well as commercial property development.
- **NATIVE SMALL BUSINESS ASSISTANCE:**
Tribal Governments Re-granting/Lending to Small Businesses-- The ICED program has provided economic development funding directly to several tribal governments which have re-granted or loaned the funds to 77 start-up or expanding Native-owned businesses in their communities:

- Blackfeet Tribe has utilized ICED funding to support 27 small businesses
- Confederated Salish & Kootenai Tribes has used ICED funding to support 26 small businesses
- The Fort Peck Assiniboine & Sioux Tribes have used ICED funding to support five (5) small businesses
- The Crow Tribe has provided loans through their Apsáalooke Nation Revolving Loan Fund program to 19 small businesses. The Crow Tribe has also provided significant business technical assistance throughout the reservation and is establishing a credit coaching/counseling program to offer tribal members.

Montana Indian Equity Fund—The ICED program has funded 91 tribal member-owned small businesses since 2007. Current funding mechanisms fund two small businesses per reservation, two for the state recognized Little Shell Tribe of Chippewa Indians, and two at-large positions for a total of 18 grants per year.

Indian Entrepreneur Technical Assistance—Another section of ICED funding is used to provide business technical assistance and training to each of the reservations and for members of the Little Shell Tribe of Chippewa Indians. Six hundred and sixty seven (667) tribal members have received business technical assistance or training since 2007. Current FY13 training includes *Profit Mastery*® business finance training.

Since 2006, \$4.4 million in state funds have been invested in ICED tribal activities, which have been matched by tribal governments and tribal businesses with over \$25 million in in-kind and matching funds.

- **INTER- AND INTRA- AGENCY COLLABORATION FOR TRIBAL COMMUNITIES:**
The CDBG Program, Treasure State Endowment Program, Coal Board, and Business Resources Division have partnered with the Montana Department of Natural Resources and Conservation (DNRC), the Department of Administration, and the Governor's Office to address the critical infrastructure condition in the Town of Lodge Grass. Lodge Grass is a fully incorporated town of 500, but is wholly enclosed within the contiguous boundaries of the Crow Reservation.

Lodge Grass provides water, wastewater, and solid waste services to an additional 90 tribal housing units immediately adjacent to the town. However, the tax base to support the ongoing O&M and capital improvements to the system are severely limited. The above-mentioned state agencies and the Town of Lodge Grass have partnered with Indian Health Service, USDARural Development, EPA, the Crow Housing Authority, rural water technical assistance entities, and the Crow Tribe to

address the critical infrastructure needs of the town as well as their financial enterprise capacity.

- The Town of Lodge Grass has previously utilized state CDBG planning funds to institute a financial accounting system that brought them into compliance with state and federal requirements and is currently developing a growth policy, capital improvements plans, and capital management plan that takes into consideration the additional service to the adjacent Johnny Wilson Tribal Housing Complex.
- A wastewater Preliminary Engineering Report was procured with the assistance of DNRC, USDA-RD, Coal Board, Bighorn County, and ICED funding.
- The Town is currently working toward activities funded construction from state and federal resources for a wastewater project estimated at \$3.7 million.

Within the constraints of our budget and staff resources, as well as our obligation to document compliance with numerous other federal laws and regulations, MDOC has demonstrated strong and sincere efforts regarding furthering fair housing through the HUD-funded programs.

SECTION D – AFFORDABLE HOUSING

The state made progress toward the objective of providing affordable housing to low- and moderate-income households during the plan year.

LIHTC: The Qualified Allocation Plan for the Low Income Housing Tax Credit program includes points for projects that targeted 40% AMI units. Of the six projects receiving allocation credits in 2014, there are 21 units targeted for 40% AMI. A total of 180 units are being built.

HOME Program: Of the renters assisted with HOME funds, more than 89% are very low-income beneficiaries, i.e., their incomes are below 50% of AMI. More impressive is the percentage of renters who fall into the extremely low-income category: more than 55% of the renters assisted with HOME funds in Montana have incomes below 30% of AMI (compared to the national average of 37.95%). These numbers consistently rank Montana in the top ten among the 51 state Participating Jurisdictions. Minority households occupied 11% of rental units, in line with Montana's total minority population. A total of 43 households received homeownership assistance, 12% of which are minorities, in line with Montana's total minority population. Two households' income was between 0 and 30% of AMI, eight households' income was between 31% and 50% of AMI, ten households' income was between 51% and 60%, and twenty-three households' income was between 61% and 80% of AMI.

CDBG: The Montana CDBG program continues to work with local governments and non-profit organizations to address low- to middle-income homeowner rehabilitation needs by developing local rehabilitation programs funded through the new CDBG Noncompetitive Housing Program. The state did not receive any applications for housing projects during 2014 competitive application cycle.

Set-aside Homeownership Mortgage Program (including Disabled Accessible Affordable Homeownership Program to provide affordable, architecturally accessible homes for people with disabilities so they can live independently.)

During the period of April 1, 2014 to March 31, 2015, MBOH provided 16 loans totaling \$1,400,184 to lower income homeowners. The average income of the homeowners was \$29,438.

First-time Homebuyer First Mortgage Program for Borrowers with Downpayment Assistance: MBOH combined all of its set-asides for borrowers receiving some form of down payment assistance in the spring of 2006 to create a pool of first-mortgage funds accessible to borrowers at or under 80% median income. Most of the down payment assistance for this set-aside comes from either HOME funds or the Home\$tart program of the Federal Reserve Bank.

Habitat for Humanity Mortgage Reinvestment Program: MBOH previously worked with representatives of Habitat for Humanity Chapters in Montana to design and implement a “wrap-around” loan program that would allow MBOH to finance Habitat homes with loans at 2% while maintaining a 0% interest rate for the borrower on the total loan amount. MBOH can no longer afford to make loans at 0%, and Habitat Chapters recognize that getting the present-value of 30 years of mortgage payments at closing is reasonable.

Lot Refinance Program: In July 2002, MBOH set aside \$1 million in recycled mortgage funds for the permanent financing of homes built on land purchased by Montana families more than two years prior to construction. Under the regular bond program, these families had been precluded from using MBOH financing due to refinance restrictions.

Rural Housing Loan Leveraging Program: Funds from USDA Rural Development are leveraged in this program with MBOH purchasing a 30-year fixed-rate first mortgage for no more than half of the purchase. MBOH no longer required mortgage insurance on its first mortgage, eliminating the payment of mortgage insurance on the first mortgage. Board of Housing does require that all borrowers take a Board of Housing-approved homebuyer education class that meets national certification standards. RD makes a loan secured by a second mortgage at a 1%, 2%, or 3% rate for the rest of the purchase. Borrowers had to meet USDA RD’s more stringent income limit requirements.

Montana House™: Eleven Montana House™ homes have been completed since April 2005. Four of the homes have been located in Great Falls. One house was moved onto

the Blackfeet Reservation during the summer of 2006. Another was sold to the Habitat for Humanity of Anaconda. MBOH and the Blackfeet Housing Authority signed an agreement that allows the Housing Authority to produce Montana House™ units for use on the Blackfeet Reservation, providing needed housing units and training students in construction skills, and completed two homes recently sold. The Miles City Community College, located in the eastern part of the state, completed two homes, which were sold locally. The Fort Belknap College has built and sold one home and has completed work on a second home that is for sale.

Native American HUD Section 184 Set-aside: As the HUD Section 184 program becomes more familiar to lenders, more loans are being made on Montana reservations.

Montana American Indian Homeownership Task Force: During the plan year, MBOH continued its successful partnership with the Montana American Indian Homeownership Task Force in attending housing fairs and planning meetings with tribal representatives. The taskforce is a coalition of state and federal agencies, nonprofits, lenders, and Indian housing authorities. The taskforce is able to work directly with Native American homebuyers on and off the reservation because of the expansion of the HUD 184 program to include statewide coverage. During SFY 2011, MBOH also attended meetings of the newly formed Montana/Wyoming Coalition of Indian Housing Authorities.

Warm Hearts, Warm Homes : Warm Hearts, Warm Homes was designed to assist in making information available to Montanans to help them identify all programs that could benefit them. A program objective was to enlist “Neighbor to Neighbor” community involvement.

Montana’s 10 HRDCs were key contacts for outreach and for making referrals to various programs. This assistance was viewed as important in helping people remain in their own homes. In this performance period, the HRDC’s worked in conjunction with the Montana Conservation Corps to provide low cost energy conservation measures to homes that are not scheduled for intensive weatherization. The Conservation Corp installed lighting, water and infiltration measures to help lower energy consumption. Funding was provided through the Department of Public Health and Human Services for those efforts.

SECTION E – SPECIAL POPULATIONS

I.E.1 MONTANA CONTINUUM OF CARE COALITION FOR THE HOMELESS

HUD has initiated an array of policies to address the critical problem of homelessness in the United States. HUD’s approach to breaking the cycle of homelessness is known as the Continuum of Care (CoC) and is an element of the consolidated planning process.

The Montana Continuum of Care Coalition for the Homeless is a statewide collaboration of diverse homeless service providers including nonprofits, faith-based organizations, and local and state governments. The coalition was formed to address Montana's challenge of having very few homeless resources to cover its vast geographical area. The system is predicated upon community and regionally based continuum of care systems, which form the statewide coalition and continuum of care process.

MT CoCC's mission is to maximize the resources that can be brought to bear in overcoming homelessness, to collectively direct the most efficient use of limited resources, and to promote a coordinated system of outreach, intake and referral, information sharing, planning, and service. MT CoCC participants share the benefit of leveraging each other's resources and efforts to provide increased and coordinated services to all homeless across the state.

While MT CoCC strives to meld and leverage programs and resources at the state level, it also strives to assure homeless persons access these programs through effective, coordinated case management and service delivery at the local level. It does so by encouraging strong community continuum of care organizations that bring all providers of homeless services together to identify needs, close gaps, coordinate client services across all programs, and to identify new and innovative approaches to eradicating homeless conditions.

I.E.2 HOMELESS NEEDS AND HOMELESS PREVENTION

Montana Statewide Homeless Survey Summary

The Montana Continuum of Care Coalition's statewide Point-in-Time survey of homelessness has now been conducted for eleven consecutive years using a consistent protocol and survey instrument. Survey dates are chosen to comply with the national HUD coordinated survey that occurs during the last ten days in January. The 2015 survey was conducted on January 29th and data will be available May 15th, HUD's latest deadline for submitting PIT into the HUD Data Exchange. The information contained here is from the 2014 survey took place on January 22nd and was sponsored by the Montana Continuum of Care Coalition, the Montana Department of Public Health and Human Services, the Montana HRDC Association (community action agencies).

The survey is implemented statewide using the 12 HRDC districts (see map in Section I.B.4). Survey efforts are based in the major population centers of each district where the majority—if not the only—services for the homeless exist, e.g., food banks, emergency shelters, soup kitchens and transitional housing. The population centers range in population from just over 100,000 to just under 5,000. An effort to reach remote camps and backcountry homeless in western Montana, especially veterans, is organized each year by a group of veteran volunteers. Surveys are also conducted in the outlying communities using field offices of service providers, most notably the HRDCs. The districts and their anchor cities are:

District 1	Wolf Point	District 7	Billings
District 2	Glendive	District 8	Helena
District 3	Miles City	District 9	Bozeman
District 4	Havre	District 10	Kalispell
District 5	Great Falls	District 11	Missoula
District 6	Lewistown	District 12	Butte

More than 200 organizations and 400 individual volunteers participate each year to reach as many homeless as possible. All surveys are scanned into a computer database, screened to eliminate duplicates and the data is converted to a query-based website for public access.

Capturing homeless populations in remote rural areas is challenging and while no homeless survey can meet rigorous scientific standards (lacking a known universe and faced with a number of uncontrolled variables), the survey nonetheless provides consistent data and a clear picture of homeless characteristics and demographics necessary for effective planning.

While the number of homeless families and persons in families (defined as having at least one adult and one child 17 years of age or younger) have decreased 19% since 2010, the number of adult individuals has increased by 30% over the same period. Nonetheless, after four years of increased homeless overall, the 2014 survey showed a 6.6% decrease from the prior year.

Using the most recent four-year average, 43% of Montana's homeless are found in the state's two largest cities of Billings and Missoula and just over three-fourths (74%) of all homeless are concentrated in only four cities; Missoula, Billings, Helena, and Kalispell. Despite a current inventory of 746 emergency shelter beds, 591 transitional housing beds and 666 permanent supportive housing beds in the state, 716 persons were still without shelter on the evening of January 22, 2014.

To address this need, the Montana Continuum of Care Coalition has formulated a strategic plan which includes proposals for 50 state-funded vouchers, use of TANF for family rapid rehousing, reallocating current CoC transitional housing grants to rapid rehousing, shortening lengths of stay and increasing turnover in all CoC funded projects and increasing ESG rapid rehousing priorities, to name a few.

Activities to Address Homelessness

Activities occurred during the plan year addressing homelessness in communities across Montana. These activities included links to community-based supportive living services.

- CDBG awarded \$450,000 in Housing and Neighborhood Renewal Funds to Lewis and Clark County, on behalf of the Helena YWCA, in combination with \$750,000 in previously awarded HOME funds, to construct a new shelter and transition housing for homeless women. Centrally located in the City of Helena, the Helena YWCA serves a larger regional area, and is the only local shelter for women.
- HOME awarded \$700,000 to the Missoula Housing Authority for new construction of a 6-unit apartment complex that will address a shortage of affordable housing for single, homeless households, prioritizing those with a mental illness or co-occurring disorder in Missoula, MT.
- In partnership with Veterans Affairs, Homeless Veteran Program, Commerce has 135 VASH vouchers to assist homeless veterans and their families. Currently, 135 veterans are housed or are in the process of being housed in Missoula, Helena, Great Falls, Bozeman, Butte, and surrounding areas. The ultimate goal of the program is to house homeless veterans statewide.

I.E.3 NON-HOMELESS SPECIAL NEEDS

Persons with Disabilities

Activities occurred during the plan year addressing housing needs and choices of persons with disabilities in communities across Montana. These activities included housing linked to community-based supportive living services, enhanced accessibility rental housing, and homeownership activities.

- During the FFY 2014, the **CDBG program** did not receive any applications for projects addressing the housing needs and choices of persons with disabilities.
- Since the inception of the program in 2005, the **Commerce Section 8 Homeownership Voucher program** has assisted 58 persons, 36 of whom are disabled, with mortgage payments. The mortgage products available through MBOH, USDA RD, and Fannie Mae were the primary first mortgage sources for these homebuyers. MDOC has coordinated the HOME down payment assistance as a means for the disabled population to move into homeownership.
- The **Montana Board of Housing Disabled Accessible Affordable Mortgage** program, targeting homebuyers who have disabilities requiring physical accommodations in their homes for below rate mortgages as low as 2.75% depending upon family income, continued to play a critical role in opening up homeownership to persons with disabilities.

Elderly

Activities occurred during the plan year addressing housing needs and choices of elderly persons in Montana.

- The RAM program enables senior Montanans aged 68 and older to benefit from an additional monthly income source by borrowing against the equity in their home. Eligibility is subject to certain age and income requirements. Loans of \$15,000 to \$150,000 are available at a 5% interest rate, based on 80% of the FHA determined property value. Four RAM loans closed during calendar year 2012. The program has assisted 193 senior households since it began taking applications. The loans do not require repayment as long as the homeowner remains in the home.
- During plan year 2014, the City of Glendive was awarded \$450,000 in CDBG housing funds to address structural problems in an occupied 18-unit senior housing facility located in an area with rapidly rising housing costs due to oil and gas development in the region.
- During Plan Year 2014, Madison County received \$450,000 to rehabilitate the County's nursing home. The funds will address significant health and safety issues, particularly in regards to ADA compliance and patient care.
- During Plan Year 2014 Powder River County received \$450,000 to rehabilitate the County's nursing home. The funds will address significant health and safety issues, particularly in regards to ADA compliance and deficiencies in meeting standards set by the Montana Department of Health and Human Services.
- HOME awarded \$750,000 to the Human Resource Council XI to rehabilitate 24 units of elderly housing in Hamilton, MT. The renovations and upgrades will address accessibility, visitability, safety and energy conservation measures. Two of the 24 units will be converted to be fully accessible.

SECTION F - OTHER ACTIONS UNDERTAKEN

I.F.1 ENHANCE INSTITUTIONAL STRUCTURE AND INTERAGENCY COOPERATION AND COORDINATION

Housing policies and housing program responsibilities are divided among a variety of agencies and organizations throughout both the state and federal governments. To aid in coordination and enhancement of program and agency efforts, Commerce created the **Housing Coordinating Team (HCT)**, a group of representatives from the various state and federal housing programs and nonprofit organizations that finance, regulate or provide housing related services. The group was formed to aid in directing and solving housing problems facing the state. The HCT seeks input from private citizens and local organizations on various housing related topics. The HCT was modeled after the Water, Wastewater, and Solid Waste Action Coordinating Team (W₂ASACT), which coordinates finances among state and federal agencies and provides assistance for community water and wastewater systems.

The goals of the HCT are to:

- Increase coordination between the various housing agencies and programs

- Identify areas where there are impediments to affordable housing development
- Improve access to housing programs through education, including multi-agency workshops
- Improve service delivery to funding recipients and
- Improve technical assistance to communities for assessing and addressing housing needs

Commerce's policy is to continue to refine and enhance application guidelines, forms, and workshops and the delivery of technical assistance to those in need of affordable housing in their community. To make the programs easier to access, the staff looks at streamlining documentation requirements each year. Commerce also expanded its role in providing and interpreting information to aid localities in determining and quantifying their housing needs and problems and finding alternative solutions to those problems.

The HCT created six workgroups to focus on issues that were repeatedly being discussed at meetings.

- The first workgroup continues the work of coordinating audits and physical inspections by each housing program in order to decrease the need to enter tenant's homes and files.
- The second workgroup is developing processes to deliver technical assistance to communities and individuals requiring help with housing and infrastructure issues.
- The third workgroup researched the need for an online housing locator service and explored the possible solutions. Now that the housing locator service, MTHousingSearch.com, is up and running, this working group is being restructured to include activities to help address impediments identified in the 2010-2015 Analysis of Impediments.
- The fourth workgroup coordinates efforts to promote housing initiatives at the state and federal levels. The workgroup developed a streamlined list of initiatives that are of concern. Each HCT member individually determines the level of lobbying they are able to do according to their individual's job restrictions. The Federal Initiatives are located on the website, along with a corresponding document of talking points, which can be printed and easily used.
- The fifth workgroup published a "White Paper" on Montana's housing needs in 2008, with updated in 2010 and again in 2012. The workgroup has subsequently decided to update and publish this report every year, and worked with the Montana Department of Revenue (MDOR) to obtain access to information from its appraisal data, and from realty transfer data. The plan is to update this document on a regular basis so that it remains accurate and useful. This document has been successful in educating the public about the true problems facing homebuyers, renters, seniors, planners, policy makers and affordable housing providers, etc.
- The newest and sixth workgroup has been formed to study ways to streamline and simplify the Uniform Application (Uni-App) for Montana Housing Loan, Grant & Tax

Credit programs. The Uni-App was completed in 1998 and is used by the housing programs. Applicants have used the Uni-App for several years and the HCT re-examines it periodically to determine if any revisions are needed. A survey has been designed and distributed to all recent users and potential users of the Uni-App to solicit input from those who use this application. The results will be used to make improvements.

For more information on the HCT, go to:

<http://housing.mt.gov/FAR/HCT/default.mcp>

The annual tax credit **Qualified Allocation Plan** information gathering meeting is held annually to discuss the QAP and make recommendations to changes for the next year's QAP. These recommendations are brought forward at a meeting and presented to MBOH board members for their consideration when making changes to the QAP.

MBOH staff from the LIHTC Compliance program hold annual compliance training for all interested owners/managers of tax credit projects. Annual compliance training is required. Participants gathered to get updates and changes in the IRS compliance processes.

The MBOH Executive Director/Housing Division Administrator sits on the board of directors for the **Montana Financial Education Coalition**. The MFEC strives to improve the personal financial knowledge and decision-making ability of Montana citizens by promoting public awareness of the need for personal financial education, and by uniting and building capacity of financial education programs. MFEC's objectives include building public and private capacity to more efficiently and effectively deliver financial education; promoting unity among financial education stakeholders; and raising public awareness of the need for personal financial education.

State housing and human service officials play a role in the activities of the **Montana Home Choice Coalition**. The coalition enhances understanding of the housing needs and desired housing choices of Montana citizens with disabilities. The coalition expects to enhance the housing opportunities of people and families with disabilities through this collaboration.

The Home Choice Coalition advocates for people with disabilities or families that have members with disabilities living with them and forms partnerships with agencies and financial institutions to provide homeownership, integrated community rental housing, supportive living housing, and other housing opportunities to these households. Coalition activities include promoting enhanced accessibility and Universal Design features in housing. The coalition provides a link between the housing and disability service communities to better serve the housing needs of persons with disabilities to open up community living choices. The coalition's website is a tool for the housing and disability communities to better meet the housing needs of person with disabilities: www.montanahomechoice.org.

The **Montana HomeOwnership Network (MHN)**, doing business as NeighborWorks Montana (NWMT), is a unique collaboration that has developed over the years in Montana to provide homeownership services to lower income families statewide. A network of organizations including NeighborWorks Great Falls (formerly Neighborhood Housing Services), the HRDCs, the City of Billings, homeWORD, and some Indian tribes train potential homebuyers. In September of 2006, MHN became a NeighborWorks chartered organization, becoming a Neighborhood Reinvestment national affiliate. With help from Neighborhood Reinvestment scholarships, NWMT helps train counselors who work with first-time homebuyers to understand the process and commitment needed to purchase a home, and provide second mortgages for down payments and closing costs. Beginning in April of 2009, NWMT and the MBOH began receiving grant funds from the National Foreclosure Mitigation Counseling (NFMC) program to help combat foreclosures in Montana. During this time, NeighborWorks and NFMC provided scholarships that enabled the state to maintain a roster of 20 foreclosure counselors in various locations around the state.

The **HOME program** promoted and assisted nonprofit organizations and other entities in applying for and receiving certification as community housing development organizations. \$200,000 was allocated to CHDOs in the plan year ended March 31, 2015. Current certified CHDOs include:

- ✓ Action for Eastern Montana, Glendive
- ✓ A.W.A.R.E., Inc., Anaconda
- ✓ homeWORD, Missoula
- ✓ District VII Human Resources Development Council, Billings
- ✓ District IX Human Resources Development Council, Bozeman
- ✓ District XI Human Resource Council, Missoula
- ✓ District XII Human Resource Council, Butte
- ✓ Mountain Home Montana, Inc.
- ✓ NeighborWorks Montana, Great Falls
- ✓ North Missoula Community Development Corp., Missoula
- ✓ Northwest Montana Human Resources, Inc., (Community Action Partnership of NW MT) Kalispell
- ✓ Resource Support and Development, Inc., Billings
- ✓ Rocky Mountain Development Council, Inc., Helena

The CDBG-ED program has a number of revolving loan funds (RLFs). The number of RLFs created and dollars under management is voluminous. Approximately eight projects per year have been funded over the past 10 years, resulting in 44 RLFs across the state, a secondary result of providing a loan to a business with CDBG-ED funds, which has provided a positive cash flow for regional loan funds.

The CDBG-ED program works with many financing and technical assistance programs within the Business Resources Division (BRD): the network of Small Business Development Centers, which are jointly funded by Commerce and the U.S. Small Business Administration, Business Location and Recruitment, the International Trade Office, Census and Economic Information Center, MicroBusiness Finance, and outside

the division, local banking institutions, community finance entities, the Montana Board of Investments programs and the Governor's Office of Economic Development.

BRD staff continues to participate at meetings and workshops with local development corporations, the federal EDA representative, USDA RD personnel, and economic developers across the state through Montana Economic Developers Association (MEDA). The CDBG-ED program also recognizes that housing and infrastructure are key components tied to economic development. Consequently, CDBG-ED works cooperatively with HOME and the CDBG public facilities and housing programs. CDBG-ED staff participates in the public involvement meetings for development of the Consolidated Plan.

In addition, state and local program administrators work closely with the Montana Job Service under the Montana Department of Labor and Industry. The Job Service often handles the application process and screening for low- to moderate-income levels. Commerce continues to work with them to better serve the CDBG-ED program. The Job Service now focuses on serving employers through their statewide network of Business Advocates. The BRD will continue to coordinate with them on training and technical assistance activities.

Commerce oversees the Big Sky Economic Development Trust Fund that was created to aide in developing good-paying jobs for Montana residents and promoting long-term, stable economic growth in Montana. Interest-only earnings from the trust fund are available for financial assistance to local governments and economic development organizations through application to Commerce. Seventy-five percent of trust fund earnings are awarded annually to local governments in the form of grants and loans for economic development projects that create new qualifying jobs for Montana residents. The remaining 25% of trust fund earnings are awarded in the form of grants to support economic development planning activities by CRDCs and other local economic development corporations.

The MicroBusiness Finance program supports a statewide network of nonprofit agencies certified by the state to administer revolving loan funds lending directly to businesses in Montana. These loan funds make loans available for economically sound business projects that may be unable to obtain adequate commercial financing. Qualified applicants may borrow up to \$100,000 to start or expand their business. The loan proceeds may be used for working capital and fixed assets. Credit decisions are based on a business plan noting repayment ability, a credit report, and management capability. Because the MicroBusiness Development Corporation (MBDC) works closely with each applicant, criteria such as collateral and credit history are evaluated on an individual basis. Terms and conditions of each loan depend on the applicant's needs, the business plan feasibility, and the useful life of the collateral.

Commerce is an active member of the Montana Economic Developers Association, a statewide association of economic development professionals, including professional

“lead” economic developers, business specialists, government employees, and staff members of affiliated nonprofit organizations that promote and foster economic development activities in Montana. MEDA is a private nonprofit organization created to increase the effectiveness of local economic development efforts by acting as a statewide resource for its membership.

MEDA sponsors educational seminars, workshops, and conferences to advance the economic development profession. It coordinates statewide economic development workshops that provide intense training for economic developers interested in obtaining professional certification. It conducts research to stimulate the interchange of ideas and experiences between individuals with mutual goals and interests. MEDA also develops network and communications systems to disseminate information and acts as a clearinghouse and contact point within Montana for other state, regional, national, and international economic development organizations and agencies.

The Community Development Division continues its participation in the Water, Wastewater, and Solid Waste Action Coordination Team (W₂ASACT). W₂ASACT is a group of professionals from state and federal governmental agencies, nonprofit organizations, for-profit organizations and engineering professionals that finance, standardize, and provide technical assistance for infrastructure, principally drinking water and wastewater systems. Meeting quarterly, W₂ASACT explores and coordinates a wide range of activities linked to improving the health and safety of infrastructure in local governments and unincorporated communities across Montana. W₂ASACT regularly sponsors and coordinates webinars and on-site public presentations to explain the various financial programs and resources available to assist local governments in funding their infrastructure needs. Civil engineers, local government representatives, and technical assistance providers are invited to present comprehensive information regarding infrastructure projects. W₂ASACT subcommittees address issues of community planning, coordination of environmental regulations, and standardizing bidding processes in order to streamline the application and project implementation process for small rural communities.

The CDD continued to utilize a Uniform Application for public facility projects mutually developed and shared by W₂ASACT agencies. Additionally, the CDBG program participated in joint public facility application workshops in cooperation with the Treasure State Endowment Program, MDNRC Renewable Resources Grant program, USDA Rural Development, INTERCAP, and MDEQ State Revolving Fund. These activities were carried out in cooperation with W₂ASACT.

I.F.2 FOSTER AND MAINTAIN AFFORDABLE HOUSING AND ELIMINATE BARRIERS TO AFFORDABLE HOUSING

The Housing Locator Subcommittee of the HCT implemented a website for property owners to list vacant rental units around the state to help Montanans find and secure affordable housing. The website, MTHousingSearch.com is a resource for low- and

moderate-income Montanans as well as renters at any other income level. The functionality of the Housing Locator service is that anyone can enter the ZIP code of the city in which they are looking for housing and the preferred rent amount, number of bedrooms, accessibility features, etc. The service provides information on all available rentals that fit the search criteria in the ZIP code area.

The Tenant Based Section 8 Program made its preliminary application available online: <http://housing.mt.gov/content/About/Section8/docs/hsgapp.pdf>. Households can apply online for the Section 8 waiting list from any location that has internet access, including public libraries, public assistance offices, etc. Applicants can also check their position on the waiting list online at www.waitlistcheck.com.

The Uniform Application (Uni-App) for Montana Housing Loan, Grant & Tax Credit programs, completed in 1998, is now used by statewide housing programs. The Housing Coordinating Team (HCT) regularly updates it. The HCT continues to work on developing common compliance monitoring forms and procedures.

As discussed in I.D.1, Commerce created the HCT to promote interagency cooperation and coordination. The members of the HCT meet periodically throughout the year and develop goals and objectives, share program information, identify housing activity, and develop ideas to pursue further coordination with individual housing providers and local organizations. The HCT participated in developing the *Housing Resource Directory*, the Uni-App for housing programs, and joint workshops.

MBOH purchased HUD 184 loans for Native American borrowers. This helps eliminate barriers for Native Americans by providing a secondary market for HUD 184 loans. As other secondary lenders tightened their lending criteria in the wake of the subprime lending crisis, many also tightened their requirements for HUD 184 loans, making them harder to fund. MBOH has not changed its requirements, and continues to be a reliable source on the secondary market for purchase of these loans.

The Montana Home Choice Coalition, formally convened in the summer of 2002, continues its mission to create better community housing choices for all people with disabilities by working through a coalition of Montana citizens, advocates, providers, local, tribal, state and federal agencies, the housing finance community, realtors, and the home building industry.

The coalition, through its lead agency A.W.A.R.E., Inc., focuses on three general housing development goals: expanding homeownership to people with disabilities; creating Olmstead-related community housing solutions for people with disabilities currently residing in institutions; and creating Universal Design, fully accessible, community-integrated affordable housing. The coalition provides technical assistance and education efforts aimed at building the capacity of the disability community to access mainstream housing resources and to engage directly or in partnership in

housing development activity. The coalition assists any individual or organization working to create better housing choices for Montana citizens with disabilities.

I.F.3 PUBLIC HOUSING RESIDENT INITIATIVES

The Housing Division acts as the state PHA administering Section 8 tenant-based assistance. Commerce does not own or directly manage public housing projects; therefore, the state has not undertaken any specific public housing resident initiatives.

I.F.4 LEAD-BASED PAINT (LBP) HAZARD REDUCTION

Montana is a rural state composed of three CDBG and HOME entitlement communities (Billings, Great Falls, and Missoula) and seven Native American Reservations with sovereign governments. Based on the number of houses in Montana that were built in 1979 or before, it is estimated that there are nearly 285,500 Montana units at risk of containing lead-based paint. Although this is approximately 69% of the housing units in the state, it is important to note that one cannot assume all of these units contain lead-based paint and the presence of lead-based paint alone does not indicate the extent of exposure hazards. Education and awareness of the potential hazards and the need to properly maintain, control, and abate paint potentially containing lead is crucial.

The state made progress in securing EPA-certified Inspectors, Risk Assessors, Supervisors, and Workers after the lead-based paint regulations for pre-1978 homes, known as Title X, Section 1012/1013, went into effect in September 2000. Participating communities have creative solutions to address LBP regulations. Even very rural towns partnered with agencies able to conduct LBP risk assessments and clearance tests.

On April 22, 2008, EPA issued Renovation, Repair and Painting (RRP) Rule, requiring the use of lead-safe practices and other actions aimed at preventing lead poisoning. Under the rule, beginning in April 2010, contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, childcare facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination.

Beginning in December 2008, the EPA rule required that contractors performing renovation, repair and painting projects that disturb lead-based paint provide the lead hazard information pamphlet *Renovate Right: Important Lead Hazard Information for Families, Child Care Providers, and Schools*⁶ to owners and occupants of child care facilities and to parents and guardians of children under age six that attend child care facilities built prior to 1978

⁶ Available at: <http://www2.epa.gov/lead/renovate-right-important-lead-hazard-information-families-child-care-providers-and-schools>

Starting April 22, 2010, the EPA rule affected paid renovators who work in pre-1978 housing and child-occupied facilities, including:

- Renovation contractors
- Maintenance workers in multi-family housing
- Painters and other specialty trades

Under the rule, child-occupied facilities are defined as residential, public, or commercial buildings where children under age six are present on a regular basis. The requirements apply to renovation, repair or painting activities. The rule does not apply to minor maintenance or repair activities where less than six square feet of lead-based paint is disturbed in a room or where less than 20 square feet of lead-based paint is disturbed on the exterior. Window replacement is not minor maintenance or repair.

However, there are some differences between the EPA Renovation, Repair, and Painting Rule and the HUD Lead Safe Housing Rule (LSHR). A major difference is that the LSHR requires clearance examinations. All housing receiving federal assistance must still comply with HUD's LSHR. HUD's Office of Healthy Homes and Lead Hazard Control (OHHLHC) web site provides information on complying with the LSHR and RRP.⁷ Additional information and requirements for renovators is available on HUD's web site.⁸

The HOME program continues to disseminate information about the rules of lead base paint.

Commerce does not have a lead testing or abatement program in place at this time and does not plan to test or study housing units located in the state. For projects assisted with HOME funds, grantees are required to ensure that the appropriate notification, inspection, testing, interim controls or abatement, and clearance activities are followed. In addition, the HOME program presents information on the LBP regulations and lead-safe work practices at workshops.

I.F.5 ANTIPOVERTY STRATEGY

Montana has a high proportion of families who live near the official poverty level. It is the goal of the state to assist these families to improve their standard of living and escape poverty. The state utilizes a number of strategies to accomplish this goal.

Montana is committed to using employment as a primary strategy for poverty reduction. The state has a well-coordinated employment and training system, which ensures that resources for advancement through employment, such as the Workforce Investment Act, Temporary Assistance for Needy Families, and state resources such as higher

⁷ Go to: http://www.hud.gov/offices/lead/enforcement/lshr_rrp_changes.cfm

⁸ Go to: http://www.hud.gov/offices/lead/enforcement/lshr_renovators.cfm.

education and economic development, are available to low-income families. Administrators of these programs meet regularly to ensure coordination and results.

The State of Montana operates Families Achieving Independence in Montana (FAIM) to provide temporary assistance for needy families.⁹ The FAIM project serves all political subdivisions in the state. In Montana, three tribes, the Confederated Salish and Kootenai on the Flathead Reservation, the Fort Belknap Indian Community, and the Chippewa Cree at Rocky Boy's, have chosen to implement a tribal TANF plan. The TANF cash assistance program provides job readiness preparation, supportive services, and case management; vigorously pursues child support; and assists in the development of community resources as a means to help families reach self-support.

TANF cash assistance program participants are considered eligible for Medicaid coverage if they meet Medicaid eligibility requirements. Adults have Basic Medicaid coverage; minor children, pregnant women, and disabled individuals receive full Medicaid coverage as stated in the Montana Medicaid State Plan. Participants are also considered categorically eligible for Food Stamp program benefits.

Services funded with TANF funds include:

- Cash assistance for the purchase of basic needs such as food, clothing, housing and personal care items
- Work supports such as transportation, vehicle repair, and items that assist individuals in continuing employment or becoming employed
- Education and training, excluding tuition

The state provides a series of work supports to stabilize families as they increase their skills and seek better employment, including TANF, food stamps, energy assistance, health care, childcare, housing assistance, and advocacy.

The Executive Branch is committed to a comprehensive approach to poverty reduction. Agencies serving low-income families have been included in a series of economic development activities. The governor has supported a comprehensive effort to end chronic homelessness in Montana.

Additionally, on May 17, 2006, the governor announced a \$1.5 million demonstration project aimed at improving the economic security of low-income families. The project is funded with part of a "high-performance bonus" the state received for its success in facilitating employment for people who get cash assistance through the TANF program. The project is administered by Public Health and Human Services and helps communities develop innovative services designed to help low-income families who

⁹ For more information, contact the Montana Department of Public Health and Human Services, Human and Community Services Division, or go to the Web site at: <http://www.dphhs.mt.gov/hcsd/>

currently receive TANF cash assistance or who have been recipients in the past year. Services will provide tools to improve financial literacy and build personal assets. Public Health and Human Services issued a request for proposals for services that include, but are not limited to:

- A comprehensive curriculum to increase families' knowledge of finances, including credit options, tax incentives, savings benefits, and lending issues
- A strategy for financial asset development for such options as home ownership and individual development accounts
- A curriculum that trains individuals on starting a new business; and education or training in high-demand employment fields

SECTION G - HOUSEHOLDS AND PERSONS ASSISTED

The State of Montana, excluding the entitlement areas of Great Falls, Billings, and Missoula, delivered housing services and programs to a significant number of households and individuals from April 1, 2014 through March 31, 2015. However, a comprehensive count of the number and types of households assisted with housing by the HOME and CDBG program during the plan year is difficult to obtain since the two programs have disparate tracking and reporting requirements in IDIS.

In program year 2014, the Montana **HOME program** aided 103 households.

HOME Unit Completions by Percent of Area Median Income*						
Activity Type	0% - 30%	31% - 50%	51% - 60%	61% - 80%	Total 0% - 60%	Total 0% - 80%
Rentals	0	0	0	0	0	0
TBRA Families	0	0	0	0	0	0
First Time Homebuyers	2	8	10	23	20	43
Existing Homeowners						
Total, Rentals and TBRA	0	0	0	0	0	0
Total, Homebuyers and Homeowners	2	8	10	23	20	43
Grand Total	2	8	10	23	20	43

* IDIS report PR23 (6A of 7) - HOME Unit Completions by Percent of Area Median Income for program year 201 2014

According to IDIS, the Montana **CDBG program** reported serving 33 beneficiaries with some type of housing assistance including rental housing, homebuyer assistance, and homeowner rehabilitation during the period April 1, 2014 through March 31, 2015. Of the persons and households receiving housing assistance during the plan year, 100% had incomes at or below 80% of AMI.

CDBG Housing Beneficiaries by Income Category*			
Income Levels	Owner-Occupied	Renter-Occupied	Total
Extremely Low (<=30%)	0	0	22
Low (>30% and <=50%)	0	0	10
Mod (>50% and <=80%)	0	0	74
Total Low Mod	0	0	106
Non Low Mod (>80%)	0	0	18
Total Beneficiaries	0	0	124

* IDIS report PR23-CDBG Beneficiaries by Income Category for program year 2014

The Commerce **Tenant Based Section 8** Housing Assistance program reported 3,500 households received assistance, compared to 3,571 in the previous year.

Number Receiving Assistance		
Current Year (4/1/11-3-31/12)	Household Type	Previous Year (4/1/10-3-31/11)
754	Identified as having an elderly head of household	453
1,855	Single-person households	1,460
1,693	Small, related, non-elderly households (2-4 people)	1,385
329	Large, related non-elderly households (5+ people)	249
3,410	Income level reported at 50% or less of AMI	3,472
2,777	Of those households, incomes reported at 30% or less of AMI	2,806
2,135	Special needs households	1,450
1,777	Of those households, incomes reported at 50% or less AMI	1,447
1,451	Of those households, incomes reported at 30% or less of AMI	1,192
43	Homeless individuals receiving Shelter Plus vouchers for rental assistance, with incomes at 50% or less AMI,	35
42	Of those individuals, incomes reported at 30% or less of AMI	24

The racial and ethnic composition of persons and households receiving Section 8 voucher assistance is presented in the table below.

Racial/Ethnic Composition	# of People (Members)		Households
	Non-Hispanic	Hispanic	
White	7,071	454	3686
Black / African American	290	29	96
Asian	53	0	24
American Indian/Alaska Native	2,844	209	1,002
Native Hawaiian / Other Pacific Islander	69	3	20
American Indian / Alaska Native & White	134	22	60
Asian & White	13	0	6
Black / African American & White	61	12	21
American Indian / Alaska Native & Black / African American	26	2	9
Other Multi Racial	0	0	0
Totals	10,562	731	4,924

National Foreclosure Mitigation Counseling Program funds. MBOH set-aside \$183,000 of its own funds and passes most of the federal grant funds to support The Montana Board of Housing is the grant recipient for HUD Housing Counseling and the statewide network of housing and foreclosure counselors who are partners in NeighborWorks Montana's housing counseling program. During the period of April 1, 2011 through March 31, 2012, clients received delinquency and foreclosure prevention counseling, rental counseling, and homeownership counseling and education.

An accurate count of homeless households receiving assistance is difficult to obtain. Many shelters only count the number of meals served or the total number of shelter

nights. This can result in families and individuals being counted several times based on how long they remain at a shelter. See the following 2014 Homeless Population and Subpopulations Chart for data from the 2014 point-in-time count.

Continuum of Care Homeless Population and Subpopulations Chart

Date of point-in-time count: January 29, 2015

Part 1: Homeless Populations

Households with at least one child and one adult	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total Number of Households	63	57	62	182
Total Number of Persons in these Households (adults and children)	189	170	223	582
Number of Persons (under age 18)	114	104	128	346
Number of Persons (18 - 24)	9	13	14	36
Number of Persons (over age 24)	66	53	81	200
Gender (adults and children)				
Female	128	98	115	341
Male	61	72	108	241
Transgender (male to female)	0	0	0	0
Transgender (female to male)	0	0	0	0
Ethnicity (adults and children)				
Non-Hispanic/Non-Latino	161	161	193	515
Hispanic/Latino	28	0	30	58
Race (adults and children)				
White	110	130	153	393
Black or African-American	5	3	5	13
Asian	0	0	0	0
American Indian or Alaska Native	63	32	60	155
Native Hawaiian or Other Pacific Islander	0	0	0	0
Multiple Races	11	5	5	21
Households without children				
	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Households without Dependent Children	324	115	607	1046
Total Number of Persons in these Households (Adults)	339	117	643	1099
Number of Persons (18 - 24)	31	13	145	189
Number of Persons (over age 24)	308	104	498	910
Gender				
Female	130	48	176	354
Male	209	68	466	743
Transgender (male to female)	0	0	1	1

Consolidated Annual Performance & Evaluation Report

Transgender (female to male)	0	1	0	1
Ethnicity				
Non-Hispanic/Non-Latino	320	108	610	1038
Hispanic/Latino	19	9	33	61
Race				
White	266	99	502	867
Black or African-American	8	1	15	24
Asian	0	0	0	0
American Indian or Alaska Native	47	9	107	163
Native Hawaiian or Other Pacific Islander	1	0	4	5
Multiple Races	17	8	15	40

Households with only children	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total Number of Households with only children	6	7	6	19
Total number of children (under age 18)	7	15	6	28
Gender				
Female	3	11	2	16
Male	4	4	4	12
Transgender (male to female)	0	0	0	0
Transgender (female to male)	0	0	0	0
Ethnicity				
Non-Hispanic/Non-Latino	6	15	5	26
Hispanic/Latino	1	0	1	2
Race				
White	5	13	3	21
Black or African-American	1	0	0	1
Asian	0	0	0	0
American Indian or Alaska Native	0	0	3	3
Native Hawaiian or Other Pacific Islander	0	0	0	0
Multiple Races	1	2	0	3

Veteran Households	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total Number of Households	52	46	179	277
Total Number of Persons	65	48	207	320
Total Number of Veterans	52	46	179	277
Gender				
Female	11	4	10	25
Male	41	42	169	252

Consolidated Annual Performance & Evaluation Report

Transgender (male to female)	0	0	0	0
Transgender (female to male)	0	0	0	0
Ethnicity				
Non-Hispanic/Non-Latino	49	45	174	268
Hispanic/Latino	3	1	5	9
Race				
White	42	41	158	241
Black or African-American	1	1	3	5
Asian	0	0	0	0
American Indian or Alaska Native	7	2	12	21
Native Hawaiian or Other Pacific Islander	0	0	1	1
Multiple Races	2	2	5	9

Youth Households	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total Number of Households	36	29	140	205
Number of parenting youth households	8	18	14	40
Number of unaccompanied youth households	28	11	126	165
Total number of persons	47	51	169	267
Total number of persons in parenting youth households	17	40	39	96
Total number of persons in parenting youth households	8	18	15	41
Number of parenting youth (under age 18)	1	6	2	9
Number of parenting youth (age 18 to 24)	7	12	13	32
Number of children with parenting youth (children under age 18 with parents under age 25)	9	22	24	55
Total number of unaccompanied youth	30	11	130	171
Number of unaccompanied children (youth under age 18)	5	1	7	13
Number of unaccompanied youth between ages 18 and 24	25	10	123	158
Gender (parenting youth and unaccompanied youth only)				
Female	20	27	74	121
Male	18	2	71	91
Transgender (male to female)	0	0	0	0
Transgender (female to male)	0	0	0	0
Ethnicity (parenting youth and unaccompanied youth only)				
Non-Hispanic/Non-Latino	35	27	140	202
Hispanic/Latino	3	2	5	10
Race (parenting youth and unaccompanied youth only)				
White	30	20	117	167
Black or African-American	0	1	4	5

Consolidated Annual Performance & Evaluation Report

Asian	0	0	0	0
American Indian or Alaska Native	6	4	21	31
Native Hawaiian or Other Pacific Islander	0	0	1	1
Multiple Races	2	4	2	8
Totals				
	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total Number of Households	393	179	675	1247
Total Number of Persons	535	302	872	1709
Number of Children (under age 18)	121	119	134	374
Number of Persons (18 to 24)	40	26	159	225
Number of Persons (over age 24)	374	157	579	1110
Gender (parenting youth and unaccompanied youth only)				
Female	261	157	293	711
Male	274	144	578	996
Transgender (male to female)	0	0	1	1
Transgender (female to male)	0	1	0	1
Ethnicity (parenting youth and unaccompanied youth only)				
Non-Hispanic/Non-Latino	487	284	808	1579
Hispanic/Latino	48	18	64	130
Race (parenting youth and unaccompanied youth only)				
White	381	242	658	1281
Black or African-American	14	4	20	38
Asian	0	0	0	0
American Indian or Alaska Native	110	41	170	321
Native Hawaiian or Other Pacific Islander	1	0	4	5
Multiple Races	29	15	20	64
Part 2: Homeless Subpopulations				
	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Chronically Homeless Subpopulations <i>(Chronically homeless subpopulation data is required for sheltered persons and for unsheltered persons)</i>				
Chronically Homeless Individuals		23	131	154
Chronically Homeless Families (Total Number of Families)		1	2	3
Persons in Chronically Homeless Families (Total Persons in Household)		3	9	12
Chronically Homeless Veterans <i>(Chronically Homeless Veteran Data is a subset of the All Chronically Homeless Individuals and Families.)</i>				
Chronically Homeless Veteran Individuals		9	57	66

Chronically Homeless Veteran Families (Total Number of Families)	0	0	0
Persons in Chronically Homeless Veteran Families Total Persons in Household)	0	0	0
Other Homeless Subpopulations (Other homeless subpopulation data is required for sheltered persons and for unsheltered persons)			
Adults with a Serious Mental Illness	168	70	238
Adults with a Substance Use Disorder	71	134	205
Adults with HIV/AIDS	0	0	0
Victims of Domestic Violence (optional)	0	0	0

ESG Households and persons Assisted – Please see ESG attachment

HOPWA

The TS HELP/HOPWA program was awarded a renewal grant for an additional three-year period beginning September 1, 2014 through August 30, 2017. The Yellowstone AIDS Project will receive \$124,741 per year. In July 2012, the TS HELP Plus grant began for three years, 9/1/2012 through 8/31/2015, in the amount of \$447,393 or \$149,131 annually, which provided an additional 27 individuals with TBRA housing assistance.

- The Yellowstone AIDS Project (YAP), serving the MT-Billings Eastern Region that includes 40 counties, reported serving 66 clients accessing the program. The clients received assistance enabling them to live in a stable housing situation and to access caseworkers and medical services consistently, ultimately improving their quality of life.

Male	57	Female	17	Average Age:.....	31 - 50 years
American Indian/Alaska Native:	9				
Black/African American:	5				
<u>Special Needs Category:</u>					
Chronically Homeless	4	Veterans.....	0		

The Open Aid Alliance (OAA) will receive \$141,147 per year awarded through the HOPWA grant. In July 2012, the TS HELP Plus grant began for three years, 9/1/2012 through 8/31/2015, in the amount of \$445,229 or \$148,410 annually, which provided and additional 17 individuals with TBRA housing assistance.

OAA serves the MT-Missoula Western Region, which includes 16 counties. OAA reported 72 clients accessing the program. The clients received assistance enabling

them to live in a stable housing situation and to access caseworkers and medical services consistently, ultimately improving their quality of life.

Male	47	Female	15	Average Age.....	31 - 50 years
American Indian/Alaska Native	4				
Black/African American.....	4				
<u>Special Needs Category:</u>					
Chronically Homeless	6	Veterans	1		

CR-55 HOPWA 91.520 (E)

Number of Households Served Through:	One-year Goal	Actual
Short-term rent, mortgage, and utility assistance payments	44	48
Tenant-based rental assistance	74	99
Units provided in transitional housing facilities developed, leased, or operated with HOPWA funds	0	0
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0	0
Total	118	147

Table 1 – HOPWA Number of Households Served

PART II ASSESSMENT OF ANNUAL PERFORMANCE

SECTION A - EFFECTIVENESS OF STATE'S PERFORMANCE

II.A.1 STATE'S EFFECTIVENESS IN MEETING ONE-YEAR (2014-2014) PROGRAM OBJECTIVES

No single approach or unique priority fits all regions of Montana equally well. Acceptably addressing the range of needs, while allocating resources equitably, makes for a complicated housing and community development policy agenda. Nevertheless, Montana remains committed to moving forward with a set of objectives to address the needs of its low- and moderate-income families.

Housing

Housing needs across Montana vary widely. There is a broad array of housing availability, affordability, and suitability issues across the state. Extreme diversity in available housing, age of housing stock, and overall range in population density complicate assessments of degree and type of need. Resources are not adequate to address all housing needs and requirements throughout the state.

As a state agency administering housing programs, Commerce does not prescribe to local governments, PHAs, and CHDOs the priority needs within their communities. The needs identified and prioritized at the state level may not retain a similar priority rating for implementation at local levels. All needs in Montana are great; the statewide priority need levels described in TABLE 2A - Montana Priority Housing / Special Needs / Investment Plan Table¹⁰ represent only a general indication of needs throughout Montana.

The Housing Coordinating Team produced the "White Paper" on Montana's housing needs in 2008 and was last updated in 2012. The HCT subsequently decided to update and publish this report every year and worked with the Montana Department of Revenue to obtain access to information from MDOR's appraisal data and from realty transfer data. This document has been successful in educating the public about the true problems facing homebuyers, renters, seniors, planners, policy makers and affordable housing providers, etc.

Faced with the overwhelming demand for affordable housing, the state implemented programs and delivered resources to in-need populations around Montana in an attempt to continually address the state's housing needs. No single objective has the same priority in all of Montana's communities. Likewise, no single action can meet the specific housing objectives of any given community. Nevertheless, Commerce committed to moving forward with the following housing objectives and actions during the plan year.

¹⁰ State of Montana Five-Year Consolidated Plan, April 1, 2010 – March 31, 2015, page 61.

- ✓ *Provide homeownership opportunities to low- and moderate-income households throughout Montana*
 - The HOME program made funds available for homebuyer programs throughout the state. In program year 2014, the HOME program allocated \$200,000, not including “recaptured funds” for single-family projects through the Single Family Noncompetitive Program.
 - The CDBG program made funds available for homeownership activities throughout the state. In program year 2014, the CDBG program allocated \$500,000 for single family and rehabilitation through the CDBG Non-competitive Housing program.
 - MBOH continued to make bond funds available that assist low- to moderate-income homebuyers during the year with financing. Provision of the regular bond program loans was severely curtailed due to the dislocation of the mortgage revenue bond market as an effect of the subprime mortgage crisis and subsequent collapse of the credit and stock markets.
 - MBOH continued to operate the Mortgage Credit Certificate program, which provides a federal tax credit to help the affordability of families in homeownership.
 - MBOH continued to make funds available through the Single Family Recycled Mortgage program to lower income persons and families who do not have the financial capabilities to purchase safe and sanitary housing through other single-family programs.
 - MBOH continued to make funds available through the Disabled Accessible Affordable Homeownership program to provide architecturally accessible homes for persons with permanent disabilities and mobility impairments.
 - The HOME and CDBG programs continued to require projects to conform to federal and state energy efficiency standards.
 - The Montana Department of Labor & Industry adopted the 2009 *International Energy Conservation Code* (IECC 2009). All new houses in Montana must meet minimum requirements of the code. The effective date of the adoption was March 26, 2010, with local jurisdictions having an additional 90-day period to incorporate the new standards. According to data from the U.S. Department of Energy, the 2009 IECC, as published, will produce approximately 15% to 18% in energy efficiency gains compared to the 2006 edition.
 - The HOME program required homebuyer education classes for all homebuyers assisted with HOME funds as a condition of receiving the funds.
 - Commerce collaborated on obtaining funds for organizations that provide homebuyer training and helped to strengthen a statewide partnership for homebuyer education and counseling, including all several of the state’s Indian Reservations. MBOH committed \$175,000 of its own funds to support this effort.

- Commerce continued to promote creative means to deliver homebuyer training in rural areas, including web-based training.
 - Commerce continued to increase awareness of and monitor the level of predatory lending practices by supporting legislation to reform the payday and title loan industry, including participating in the Montana Financial Education Coalition.
 - Commerce continued to support the Section 8 Homeownership Voucher program. Eleven agencies are authorized to participate in the homeownership program and 48 households around the state have been assisted.
 - Commerce coordinated with educational institutions to facilitate technical construction, weatherization and home-improvement courses.
 - Commerce supported private foundations committed to leveraging federal dollars for affordable housing throughout the state.
 - Commerce continued to support the Montana House™. The program constructs one-story homes: three-bedroom, two-bath new home that is available in four different floor plans: 960, 1,008, 1,200, or 1,400 square feet.
- ✓ *Improve the quality and availability of affordable rental housing for low- and moderate-income households.*
- HOME funds continue to provide funding to rehabilitate existing and construct new rental housing.
 - LIHTC program funds were awarded to construct or preserve rental housing units around the state
 - Commerce continued to promote housing that is modified or constructed to meet federal and state energy efficiency standards
 - Beginning in the 2007 funding year, the LIHTC and HOME programs provided bonus points through its competitive application process for projects that include energy efficiency and green building components
 - New construction using HOME and CDBG funds are required to conform to federal and state energy efficiency standards
 - MDOLI adopted IECC 2009. All new houses in Montana must meet minimum requirements of the code. The effective date of the adoption was March 26, 2010, with local jurisdictions having an additional 90-day period to incorporate the new standards. According to data from DOE, IECC 2009, as published, will produce approximately 15% to 18% in energy efficiency gains compared to the 2006 edition.
 - The Section 8 housing choice voucher program provided essential rental subsidy to 3,571 very low- and low-income Montanan households.

- MBOH offered permanent mortgage financing for affordable rental housing in partnership with HUD's Risk Sharing program, which provides mortgage loan insurance. Although no loans were made during the program year, the program remains available.
 - MBOH offered permanent mortgage financing through its General Obligation program, which issues tax-exempt bonds to finance projects that do not have mortgage insurance. Although no projects were funded during the program year, the program remains available.
 - Commerce supported the Mountain Plains Equity Group, Inc. (MPEG), a small investment syndicator that makes investments in LIHTC projects and historic tax credit projects. Smaller projects, particularly in rural communities, can be expensive and difficult for housing authorities, nonprofit entities, and other developers to put together. MPEG eases the development of multi-family housing by providing limited but essential relief through partnerships with local state and nationally chartered banks.
- ✓ *Provide housing options for the elderly and special needs populations.*¹¹
- MBOH marketed and supported the Reverse Annuity Mortgage Loan program, which enables Montana homeowners over 68 years old to provide for their own in-home support by utilizing cash from a reverse annuity mortgage. Through March 31, 2012, the RAM program had assisted 204 senior households since it began taking applications.
 - HOME and CDBG program funds were used to develop projects targeted to assist individuals with a physical disability, developmental disability, mental illness, or who are elderly:
 - HOME awarded \$750,000 to the Human Resource Council XI to rehabilitate 24 units of elderly housing in Hamilton, MT.
 - HOME awarded \$700,000 to the Missoula Housing Authority to construct 6 units of housing for homeless and mentally ill individuals
 - CDBG awarded \$450,000 to Powder River County to rehabilitate a nursing center. The project will provide a decent, safe, and sanitary place for senior citizens to receive living assistance as well as medical and nutrition services.
 - CDBG awarded \$450,000 to Madison County to rehabilitate a senior citizen's center and nursing home. The project will provide a decent, safe, and sanitary place for senior citizens to gather and receive supportive medical and nutrition services.

¹¹ HUD defines special needs households as a household where one or more persons have mobility impairments or disabilities, i.e., mental, physical, developmental, persons with HIV/AIDS; or with alcohol or other drug addiction that may require housing with supportive services.

- Commerce funds, including HOME, CDBG, MBOH, and Section 8 homeownership vouchers, continue to be used in conjunction with the Montana **Home Choice Coalition for group living and homeownership opportunities** for persons with severe and disabling mental illness and other disabilities.
 - Of the 58 households assisted with Section 8 homeownership vouchers, 36 were households with a family member that had a disability
 - MBOH made funds available through the Disabled Accessible Affordable Homeownership program to provide architecturally accessible homes for persons with permanent disabilities and mobility impairments.
 - Commerce continued to support education regarding universal design and accessibility requirements in order to increase the number of accessible multi- and single-family units available.
- ✓ *Affirmatively further fair housing and implement objectives and actions identified in the Analysis of Impediments to Fair Housing*¹²
- All HOME and CDBG grantees are required to abide by fair housing laws and take actions to provide housing services and programs free of discrimination.
 - Records were maintained reflecting the analysis and actions taken, if applicable
 - Steps were taken to improve the understanding of fair housing law and proper construction practices by continuing to publish and distribute fair housing educational materials and guides
 - Commerce supported its role as an information clearinghouse by including information on the Housing Division website:
 - Montana Landlord/Tenant Law
 - Federal and Montana fair housing laws
 - ADA and 504 design and construction standards
 - Providing a list of “housing rights, fair housing advocates, legal assistance, and other resources” as a “featured resource” on its web page <http://housing.mt.gov/>. Originally developed as a component of the *Montana Housing Resource Directory*¹³, the listing provides basic information on where citizens can find assistance for issues relating to housing rights, fair housing, legal issues, etc.¹⁴

¹² *Analysis of Impediments to Fair Housing and Housing Choice*, Western Economic Services, LLC, November 2004

¹³ *Montana Housing Resource Directory*, Montana Department of Commerce, September 2011; <http://housing.mt.gov/CP/housingresourcedirectory.mcpX>

¹⁴ The material included in the directory is not intended as legal advice or as a promotion or guarantee of the reliability or appropriateness of programs, businesses and individuals listed or linked. In certain

- The Housing Locator Subcommittee of the HCT developed a website for property owners to list vacant rental units around the state to help Montanans find and secure affordable housing. The free website, MTHousingSearch.com, is a resource for low- and moderate-income Montana renters. The locator service can assist landlords in meeting affirmative marketing requirements.
 - The Tenant Based Section 8 Program makes its preliminary application available online: <http://housing.mt.gov/About/Section8/apply.mcp>. Households can apply online for the Section 8 waiting list from any location that has internet access, including public libraries, public assistance offices, etc.
- ✓ *Decrease housing environmental hazards, such as lead-based paint and asbestos.*

The programs:

- Enforced all applicable federal and state environmental laws
 - Presented information on the new LBP regulations. As of April 22, 2010 the EPA/HUD joint Lead; Renovation, Repair, and Painting Program Rule affects paid renovators working in pre-1978 housing and child-occupied facilities, including renovation contractors, maintenance workers in multi-family housing, painters, and other specialty trades. Under the rule, child-occupied facilities are defined as residential, public or commercial buildings where children under age six are present on a regular basis. Contractors are required to have a certified renovator on board for each job taking place in a home or facility defined by the rule.
 - Continued to require the appropriate notification, inspection, testing, interim controls or abatement, and clearance activities are followed
 - Continued to provide information on lead-based paint training
 - EPA-Authorized Lead Renovation, Repair, and Painting (RRP) Courses are offered by the Montana Weatherization Training Center at MSU-Bozeman, the only EPA accredited training provider in Montana
- ✓ *Improve the efficiency of Commerce housing programs*
- Through the HCT, the HOME, CDBG, MBOH, and USDA RD staffs participated in efforts to simplify and standardize housing program delivery in Montana by using the Uni-App. The uniform application underwent changes in 2012 based on input from past and potential applicants.
 - MBOH and Housing Division staff explored options to improve compliance monitoring functions to help existing projects.
 - The HOME program examines its allocation procedure in order to simplify and maximize the efficiency with which HOME funds are allocated and to ensure that they are being leveraged to the greatest extent possible. During the plan year,

instances, readers of the directory may want to consult with legal counsel. MDOC assumes no liability for the content of information provided in the directory or the content of links listed in the directory.

the HOME program revised the qualification package for local governments, CHDOs, and PHAs to become Qualified Entities for homebuyer assistance activities. Similar revisions are forthcoming for homeowner rehabilitation activities.

- During this plan year the HOME program continued to offer an open application round allowing applicants a more one-on-one service for all remaining funds after the first competitive round.
- The CDBG program continues to encourage communities to use housing funds as part of an overall neighborhood or community renewal effort.
- Commerce utilized technical assistance providers with an emphasis on community needs assessment and project development. Staff members of each Commerce program continued to market the programs and educate potential participants in the programs. The CDBG program, in coordination with the Community Technical Assistance Program (CTAP), provided capacity building training and other technical assistance to local governments. This training relates to general community planning, capital improvement planning, planning for and providing affordable housing, fair housing education, and environmental compliance.
- Commerce promoted training opportunities in housing construction as part of an overall economic development strategy that specifically targets training to at-risk populations, such as residents of Indian Reservations, participants in the Job Corps, and inmates in the prison system
- The Tenant Based Section 8 Program makes its preliminary application available online: <http://housing.mt.gov/About/Section8/apply.mcp.x>. Households can apply online for the Section 8 waiting list from any location that has internet access, including public libraries, public assistance offices, etc. Applicants can also check their position on the waiting list online at www.waitlistcheck.com.

✓ *Other Actions*

- The Department of Public Health and Human Services in concert with the Governor's office and other state agencies initiated a program entitled Warm Hearts, Warm Homes in 2005 and support for the program continues. The program makes information available to all Montanans to help them identify programs that could benefit them. A website exists to advertise available resources and enlist "Neighbor to Neighbor" community involvement. The website has information on weatherization, saving energy, and other resources to help families stay warm. Montana's 10 HRDCs are key contacts for outreach and for making referrals to various programs. This assistance is viewed as important in helping people remain in their own homes. Additionally, as part of this effort, the Department provides funds to the Montana Conservation Corp to provide low cost energy conservation services to low-income families not scheduled for intensive weatherization measures.

- Commerce continued the work of Housing Coordinating Team, which has helped the program staff to better understand each of the programs and how they work together, as well as areas where the programs do not work well together. The HCT, as an advisory group, helped facilitate statewide coordination in delivery of housing services and created five workgroups to focus on issues that were repeatedly discussed at meetings.
 - The first workgroup continues the work of coordinating audits and physical inspections by each housing program in order to decrease the need to enter tenant's homes and files.
 - The second workgroup is developing processes to deliver technical assistance to communities and individuals requiring help with housing and infrastructure issues.
 - The third workgroup researched the need for an online housing locator service and explored the possible solutions. The housing locator service, MTHousingSearch.com is now available.
 - The fourth workgroup coordinates efforts to promote housing initiatives at the state and federal levels. The workgroup developed a streamlined list of initiatives that are of concern. Each HCT member individually determines the level of lobbying they are able to do according to their individual's job restrictions. The Federal Initiatives are located on the website, along with a corresponding document of talking points, which can be printed and easily used.
 - The fifth workgroup continued to gather data on housing, incomes, units, structures, rents, etc., for each of the 56 counties in the state and assembled a "white paper". The working group is currently in the process of updating this document for 2010, and intends this document to illuminate the problems specifically facing affordable housing in Montana and give communities the reason to begin planning now. The HCT realizes and is emphasizing that each community will have its own set of problems. The working group plans to develop a toolbox that can be used by communities to solve each of their individual problems and concerns.
 - The newest and sixth workgroup has been formed to study ways to streamline and simplify the Uniform Application for Montana Housing Loan, Grant & Tax Credit programs. The Uni-App was completed in 1998 and is used by the housing programs. Applicants have used the Uni-App for several years and the HCT re-examines the Uni-App periodically to determine if any revisions are needed. A survey has been designed and distributed to recent users and potential users of the Uni-App to solicit input from those who use this application. The results will be used to make improvements.
- The HOME program has 15 certified CHDOs providing significant nonprofit housing development capacity within the state. Most CHDO's participated in an extensive HUD training about building CHDO capacity.

- HOME funds support the housing objectives in a variety of ways: HOME grantees construct new affordable units to increase the housing stock, offer down payment and closing cost assistance to increase the ability of low-income households to purchase homes, and offer rehabilitation programs to finance housing maintenance, accessibility and other improvements, and energy efficiency measures as long as those activities are part of a larger strategy to bring the entire home up to code.
- The HOME program requires recipients to complete homebuyer education before receiving down payment and closing cost assistance.
- HOME, CDBG, and MBOH staff participate in application workshops, educational webinars and Consolidated Plan public meetings to promote the programs and conduct outreach to local governments, nonprofits, and other organizations in all areas of the state whenever possible.
- All documentation associated with the HOME program, **application guidelines**, **administrative manuals**, etc., are available on Commerce's website: <http://housing.mt.gov/HM/default.mcp.x>. The online administrative manual is updated throughout the year as needed.

Homelessness

The continued role of the statewide Continuum of Care is critical in meeting the needs of the homeless population in Montana. The MT CoCC actions to promote and guide the group's work plan include:

- Implement a statewide coordinated entry system.
- Review and assess the Homeless Management Information System.
- Conduct an annual statewide survey and resources inventory to count and assess homeless needs
- Conduct ongoing assessment of strategic plan progress and implement action plans
- Contributing to the annual update of the state Consolidated Plan

The MT CoCC collaborates with Public Health and Human Services in developing the state plan, retooling HMIS to accommodate its needs, training local agencies, developing monitoring tools and participating in regular troubleshooting and updating conference calls.

Economic Development

The CDBG-ED program met its projected goals for the development of economic activity in Montana in the following ways:

- *Increase viable economic development projects that promote investment of private capital, expansion of local tax bases, and creation of permanent year-round jobs principally for low- and moderate-income Montanans*
- For program year 2014, the CDBG-ED program's grant recipients projected the retention of 5 jobs and creation of 13 jobs, of which more than 51% will be held by or made available to LMI. Of those local governments awarded funding, there is over a 1.2 match of private and public funding.
- *Increase economic activity that adds value to a product through manufacturing, refining, processing or packaging, especially those activities that involve Montana's natural resources*

There were two businesses that received 2014 CDBG-ED assistance, both of which add value to a product through manufacturing, processing or packaging (Mountain Meadow Herbs, Superior Meats).

- *Increase economic activity that creates new wealth in Montana by selling the majority of its products outside of Montana, by effectively substituting goods previously produced outside of Montana with goods produced in Montana, or by distributing Montana-made goods*

No applications received for this type of business during program year 2014.

- > *Increase service companies such as consulting, engineering, or other companies that sell their services predominantly (greater than 50%) outside of Montana*

No applications received for this type of business during program year 2014.

- *Allow local communities to identify their own needs and develop their own initiatives*

Two awards were made for planning during the 2014 program year.

Businesses and communities received technical assistance from MDOC staff while developing their community goals, onsite visits, and coordination with other programs.

- *Assist businesses and communities in achieving prosperity by using program resources to leverage other private and public resource.*

In program year 2014, CDBG funds were leveraged by private and public funding 1.2. Over the past five years, CDBG funds have been leveraged by over \$7 in outside funding for every CDBG dollar invested.

- *Assist micro-enterprise development through technical assistance funding*

- No funding was provided for micro-enterprise development through technical assistance funding.

- *Assist new and expanding businesses with employee training needs*

No applications received for this type of business during program year 2014.

- *Assist communities and small businesses in gaining access to federal funding for research and development through the State of Montana Small Business Innovation Research program*

- The program did not receive a request for this type of assistance during the 2014 program year.

- *Place a priority on projects that create higher paying jobs*

The CDBG-ED program discourages proposals that involve assistance to businesses such as hotels, motels and retail operations, except under mitigating circumstances, because of the lower quality of jobs and the high likelihood of competition with existing local businesses. Projects may be eligible where certain mitigating circumstances exist and support by other competing local businesses can be documented; i.e., a grocery store in a small town in a sparsely populated area where there is no other competition. The CDBG-ED program awarded funding to businesses that pay competitive wages and provide benefits to their employees.

Jobs assisted under the 2014 program year are well paying jobs and an asset to their regions.

- *Fund more high-technology businesses and manufacturing operations, including value-added agricultural products, based on current demand*

Help create over 200 jobs per year, of which more than 51% will be held by or made available to low- and moderate-income persons

With the two (2) awards during the 2014 program year, the CDBG-ED program expects to retain 5 jobs and create 13 jobs of which over 51% will be held by or made available to LMI. The program anticipates a large number of applications for CDBG-ED assistance during the 2015 program year.

- *Leverage \$12 to \$13 of other funds for each \$1 of program funds*

Proposals awarded funding during this program year are providing over \$2 non CDBG-ED dollars in match for every \$1 of CDBG-ED funds. Over the last five years, private and public funding has matched CDBG-ED funds over \$7 non CDBG-ED dollars for every \$1 CDBG-ED dollar.

Infrastructure and Public Facilities

Infrastructure needs across Montana vary widely. As a state agency administering non-housing community development programs, Commerce does not prescribe to local governments the priority needs within their communities. All infrastructure needs in Montana are great. Faced with the overwhelming demand for non-housing community development, the state implements programs and delivers resources to in-need populations around Montana in an attempt to continually address the state's non-housing community development needs. No single action can meet the specific non-housing community development objectives of any given community. Nevertheless, Commerce committed to moving forward with non-housing community development objectives and actions.

- *Provide community and development opportunities to low and moderate income residents and strengthen communities within the state*

During program year 2014, the CDBG program:

- Awarded planning grants, to identify overall community development, housing and neighborhood renewal needs. In cooperation with the Community Technical Assistance Program, local governments complete planning grant activities with the assistance of planning and engineering staff in the Community Development Division. These planning grants are necessary to get a project under way or to conduct other important community planning activities such as preparing or updating a comprehensive plan or growth policy; preparing a neighborhood redevelopment plan; preparing a preliminary engineering or architectural report, capital improvement plan, housing study, or similar planning studies needed to help a community address critical needs.
- Provided technical assistance to communities to encourage them to access CDBG funding and to ease compliance with the federal regulations tied to CDBG funding. CDBG holds annual grant application workshops in various locations across the state to ensure that all communities are able to submit a competitive application and information concerning the grant funding. CDBG also holds one-on-one grant administration manual trainings for each community awarded funding to increase their ability to successfully navigate and report on all program requirements.
- Continued to market the resources available to build affordable infrastructure/ public facilities by participating in the W₂ASACT public facility webinars and workshops. The workshops are designed to familiarize local governments with federal and state low interest loan and grant programs that are available to assist with financing for water, sewer, and solid waste improvement projects. Planning and applying for infrastructure improvements workshops and webinars were held across the state during plan year 2014.

- Continued to support the other programs administered by the Commerce Community Development Division, which are critical to assisting local governments in meeting their infrastructure needs.
 - During the year before each biennial Legislative session the Treasure State Endowment Program receives applications from counties, cities and towns, tribal governments, and water and sewer districts for construction project grants. Grants will reviewed with possible award through the legislative process. Over \$150 million in matching construction grants have been awarded to over 350 local governments since 1993.
 - The Montana Coal Board has been an active participant with local governments in coal-impacted areas. During the 2015 biennium the Coal Board received \$3,918,811 to award to entities in coal-impacted areas. Grants are awarded for projects related to water system improvements, school additions and accessibility improvements, road repair equipment purchases, hospital improvements, law enforcement equipment, and the preparation of planning documents.
 - The Hard Rock Mining Impact Board actively assists local governments to mitigate the fiscal impacts on local government services and facilities due to new large-scale hard rock mining development.
- Continued to actively participate in other W₂ASACT activities, including:
 - Maintaining a uniform method of tracking project expenditures for infrastructure projects funded by multiple agencies; andContinuing to conduct outreach to tribes based on specific community and project needs.

II.A.2 SELF-EVALUATION

The primary long-term goal of Montana's three formula grant programs, as stated in the FFY 2010-2015 Consolidated Plan, is to develop viable communities by providing decent housing, a suitable living environment, and expanding economic opportunities principally for low and moderate-income persons.

As described in Section II.A.1, *State's Effectiveness in Meeting One-Year (2011-2012) Program Objectives*, the state made progress in implementing affordable housing and community development programs, benefiting Montana's low and moderate-income households. The state has continued to evaluate and refine its efforts in respect to the implementation of the formula grant programs and other housing and community development-related programs it administers.

At the end of the program year, March 31, 2015, Montana's HOME program was ranked 7th overall of 51 statewide participating jurisdictions (PJs) ranked by HOME

Performance Snapshots.¹⁵ Montana's HOME program had committed 89.92% of its funds committed and had disbursed 88.45% of its funds.

Montana's CDBG program continues to meet HUD's requirement for the timely distribution of funds.¹⁶

In terms of the Consolidated Plan, the state believes it is satisfactorily meeting its pro rata goals. Although the state does not foresee any significant program adjustments at this time, it routinely evaluates the effectiveness of its programs, seeking public comment as needed. If the evaluation of the programs indicates adjustments are needed, the state will take appropriate steps to make the adjustments.

II.A.3 ACQUISITION, REHABILITATION OR DEMOLITION OF OCCUPIED REAL PROPERTY DURING PLAN YEAR 2014

During plan year 2014, the HOME, CDBG, and NSP programs completed acquisition, rehabilitation, or demolition activities on the following projects:

- HOME direct and program income funds were awarded to NeighborWorks Montana, District XI HRC, and District IX HRDC to assist 43 income-eligible households with down payment & closing cost assistance of occupied (or owned) properties.
- Hill County acquired easements across privately owned property as part of its infrastructure project funded with plan year 2013 CDBG funds to extend municipal water services to North Havre RSID #21 and #11, serving 266 persons of low to moderate-income with direct assistance of payment of hook-up fees and assessments.

The ESG program has not funded projects that involve the demolition of occupied real property. None of the program year 2014 ESG grant projects involves permanent relocation activities that would fall under the URA.

SECTION B - PROPOSED ACTIONS RESULTING FROM ASSESSMENT OF ANNUAL PERFORMANCE

One of the best ways to facilitate and encourage the development of housing is through education and technical assistance. Many people perceive the array of housing programs and regulations as too complex or too foreign to master. Commerce is determined to expand its role in providing technical assistance to local jurisdictions to explore and accurately determine the degree and type of local needs and educate people on the programs available. This will help more groups qualify for housing programs and help them better understand the requirements of those programs. To this

¹⁵ https://onecpd.info/reports/HOME_Snap_PJ_Snapshot_AAAA-MT_MT_20140331.pdf.

¹⁶ Notice: CPD-14-06; *Timely Distribution of State CDBG Funds*; Issued March 10, 2014; <http://portal.hud.gov/hudportal/documents/huddoc?id=14-06cpdn.pdf>

end, an HCT workgroup is developing processes to deliver technical assistance to communities and individuals requiring help with housing and infrastructure issues.

The HOME program is committed to analyzing its competitive grant allocation process to ensure that it meets the strategic needs of Commerce to disburse scarce funds throughout the state for a variety of activities. At the same time, the allocation process needs to be equitable to all communities and as straightforward as possible so that every community has equal access to the program.

These efforts resulted in revisions to the contract, grantee Management Plan, and restriction agreements for the Single Family Noncompetitive Allocation Pilot Program described earlier (page 21). The HOME program continues to analyze other potential options for improving its allocation process and additional changes may be forthcoming.

During plan year 2012, the Housing and Community Development Divisions received comments from interested parties asking that “visitability” be required as a minimum building standard for all ground floor units funded by HOME, LIHTC, CDBG, and ESG. These “visitability” aspects included:

- At least one zero-step entrance;
- Doors with 32 inches of clear passage space; and
- One bathroom on the main floor with maneuver space for a wheelchair.

As a result of these comments, HOME and CDBG began to require that funded rental and multi-family projects meet the minimum accessibility requirements found in Section 504 of the Rehabilitation Act of 1973. In accordance with Section 504:

- For **new construction** of multi-family projects (with 5 or more units), a minimum of 5% of the units in the project (but not less than one unit) must be accessible to individuals with mobility impairments, and an additional 2% of the units (but not less than one unit) must be accessible to individuals with sensory impairments.
- The Section 504 definition of **substantial rehabilitation** multi-family projects includes construction in a project with 15 or more units for which the rehabilitation costs will be 75% or more of the replacement cost. In such developments, 5% of the units in the project (but not less than one unit) must be accessible to individuals with mobility impairments, and an additional 2% (but not less than one unit) must be accessible to individuals with sensory impairments.
- When **rehabilitation less extensive than substantial rehabilitation** is undertaken, alterations must, to the maximum extent feasible, make the unit accessible to and usable by individuals with handicaps, until 5% of the units are accessible to people with mobility impairments. Alterations to common spaces must, to the maximum extent feasible, make the project accessible.

The usual standards for ensuring compliance with Section 504 are the Uniform Federal Accessibility Standards (UFAS), although deviations are permitted in specific

circumstances. MDOC recently received notice from HUD that the 2010 ADA Standards for Accessible Design (2010 Standards) will be acceptable alternative to the UFAS when undertaking new construction or alterations to existing structures with CDBG or HOME funds on or after May 23, 2014.

Currently, the Montana LIHTC Program's accessibility requirements for all new construction and major rehabilitation that replaces interior walls and doors incorporates the following:

- 36-inch doors for all living areas (except pantry, storage, and closets)
- Levered handles for exterior and interior doors (except exterior swing doors)
- Outlets mounted not less than 15 inches above floor covering
- Light switches, control boxes and/or thermostats mounted no more than 48 inches above floor covering
- Walls adjacent to toilets, bath tubs and shower stalls require reinforcement for later installation of grab bars
- Lever style faucets for laundry hook-up, lavatory and kitchen sink; and
- No-step entry to all ground floor units.

"Standard housing" is defined as a housing unit which, at the minimum, meets the following standards:

1. Housing quality standards (HQS) set forth in Section 8 Program for Housing Quality Standards (HQS) (24 CFR 982.401);
2. All zoning ordinances and uniform codes adopted by the state, which are national or international code (further discussed in the Removing Barriers To Affordable Housing section of the Consolidated Plan).

"Substandard suitable for rehabilitation" means a housing unit, or in the case of multi-family dwellings, the building(s) containing the housing units, where the estimated cost of making the needed replacements and repairs is less than 75 percent of the estimated cost of new construction of a comparable unit or units.

"Substandard not suitable for rehabilitation" means any such housing unit or units for which the estimated cost of making the needed replacements and repairs is greater than or equal to 75 percent of the estimated cost of new construction or comparable unit or units.

These definitions are not intended to prevent the preservation of substandard housing not suitable for rehabilitation if the project sponsor and/or MDOC determine that the unit or units should be rehabilitated and preserved to achieve other goals established for the project, including, but not limited to, the preservation of buildings with historical or architectural significance.

II.B.1 TECHNICAL ASSISTANCE

The role of the state will expand in the areas of providing and interpreting information that assists localities in determining and quantifying their housing needs and problems and identifying alternative solutions to those problems. Commerce intends to expand educational outreach activities so that additional information and education is provided concerning fair housing, as well as landlord and tenant rights and obligations.

Montana Department of Commerce

The Community Technical Assistance Program (CTAP) is staffed with an AICP certified land use planner and Land Use Attorney to provide technical assistance for all Montana communities including those that apply for CDBG funding.

Financial and technical assistance from the other CDD programs, including HOME, CDBG, TSEP, Quality Schools, Montana Main Street, Coal Board, and Hard Rock Board provided involves housing and public facilities project planning, financing, and management; community needs assessment, planning, and growth management; and mitigation of impacts associated with coal mining, hard rock mining, and oil and gas development.

Because of the continual turnover of officials and staff of local governments and nonprofit community organizations, technical assistance and training are long-term recurring needs. CDD will continue to provide financial support, training, and technical assistance to Montana counties and municipalities, local elected officials and staff, nonprofit organizations, private sector developers, consultants, and private citizens. Other entities needing assistance and support include local government planning boards and planning departments, community development corporations, human resource agencies, county water and sewer districts, Tribes, rural fire departments, and housing authorities.

CDD will continue to coordinate its technical assistance efforts with the regional workshops conducted by the interagency W₂ASACT and the Housing Coordinating Team in order to achieve maximum efficiency and effectiveness.

The Business Resources Division will continue to provide support and technical assistance to local jurisdictions and revolving loan fund managers with loan documentation, financial analysis, and project administration as well as providing education webinars. The BRD's economic development programs, especially the Small Business Development Subcenters, the MicroBusiness Development Corporation network, and the CDBG-ED program, continue to cooperate in coordinating and sharing resources that are beneficial to assisting local governments and businesses across the state.

The CDBG-ED program staff provides ongoing technical assistance to 44 CDBG-funded revolving loan funds across the state. Commerce encourages local governments to

contract with a regional development organization that has been qualified as a Certified Regional Development Organization. The CRDC program has eleven designated CRDCs across Montana providing revolving loan fund management, and technical assistance to small businesses.

The Commerce Housing Division continues to conduct information-gathering and educational sessions via webinar to encourage broader participation.

The *Montana Housing Resource Directory*¹⁷ includes descriptions of a variety of federal, state, and local housing programs available in Montana. A section on “Housing Rights, Fair Housing Advocates, Legal Assistance, and Other Resources” is provided in the directory and on the Housing Division’s Web page. The directory and associated reference guide are meant to provide an overview of the available programs along with contact information.

Go to <http://housing.mt.gov/cp/cpreportsandstatistics.mcp>x to access other housing, economic, and demographic reports and statistics.

The Housing Coordinating Team’s technical assistance workgroup is creating a process that communities can use in their search for housing technical assistance. Creation of a brochure that contains technical assistance information is forthcoming. A web site, <http://housing.mt.gov/FAR/HCT/TA/default.mcp>x, was recently debuted. Information for assistance in writing grants and guidance in restoring building skills to help communities solve housing are being explored and developed.

Montana Department of Public Health and Human Services

The ESG has functioned well since its inception. Funds are made available to local community based groups who then utilize local planning processes to involve homeless providers in the most practicable strategy for their individual communities.

The Montana HOPWA programs have been active in servicing their communities and continue to participate fully providing much needed services. The Open Aid Alliance and Yellowstone AIDS Project work well with their partners within the community and are well on the way to meeting the goals for the current year for both the HOPWA and HOPWA Plus grants. Montana State University works with Public Health and Human Services in providing technical assistance and gathering data to support the progress of the programs. Both OAA and YAP have begun using the Homeless Management Information System for their annual progress reports, a vital step in improving the efficiency of data collection and effectiveness in reporting.

Members of Montana’s Continuum of Care Coalition have a commitment to working with various segments of the homeless population. One of those segments that has proven

¹⁷ *Montana Housing Resource Directory*, Montana Department of Commerce, September 2011;
<http://housing.mt.gov/CP/housingresourcedirectory.mcp>x

to be the most intractable is the chronically homeless, those persons with a disabling condition that have been either continuously homeless for a year or more, or have had at least four episodes of homelessness in the past three years. Although the problem of chronic homelessness may not be as acute in Montana as in more urban areas, it is the MT CoCC's most challenging obstacle to eradicating homelessness.

The former Montana Council on Homelessness worked with Public Health and Human Services and examined solutions to the root causes of homelessness and worked through education, public awareness, broad-based collaboration between state, federal and local stakeholders, research, publications, identification of policy issues and implementation of solutions. Throughout 2007 and 2008, MTCoH maintained an online survey designed to garner the public's perceptions of homelessness in their communities. The survey asked questions that paralleled, as much as possible, the questions asked by the annual *Survey of the Homeless*.

MTCoH also increased access for the homeless to such programs as Medicaid, food stamps, TANF, housing and other services designed to foster self-sufficiency through participation in resource development and training.

The issues that cause, rise from, and sustain homelessness cross many system boundaries, beginning with the most basic human needs. The MTCoH examined solutions that pulled together as many sectors as possible, including (but not limited to) social services, the faith community, local municipalities, state and federal government agencies, corrections, community law enforcement, chemical dependency and mental health treatment, housing, economic development, career training and employment, policy, education, youth services and many others.

Former MTCoH staff is working with a dedicated committee to create the Montana Coalition for the Homeless. MCH will be requesting 501(c)(3) status and implementing by-laws and a governing board; the goal is to have MCH functioning by fall 2010. There has been a great deal of interest and enthusiasm from advocates throughout the state. MCH will take a different approach to addressing homelessness than any other organization, including the MT CoCC. The focus will be on education, advocacy and providing a voice for people who have been or who are homeless. To date, at least a third of those who have volunteered to serve on the founding board are coming with direct, personal experience of homelessness.

II.B.2 REFINEMENT OF INSTITUTIONAL STRUCTURES

Commerce continues its ongoing effort to make the planning process and resulting documents more user-friendly, readable, and concise. All consolidated plan documents are available on the Internet for interested parties to read and download: <http://housing.mt.gov/cp/cpdocuments.mcp>

Many other supporting documents are also available online. Commerce, through the Housing Coordinating Team, continues to identify areas where further communication

and cooperation are needed, and identify gaps in the institutional provision of services. HOME, CDBG, and MBOH workshops include a “how to” technical assistance component and participation in statewide housing meetings and local housing meetings will continue.

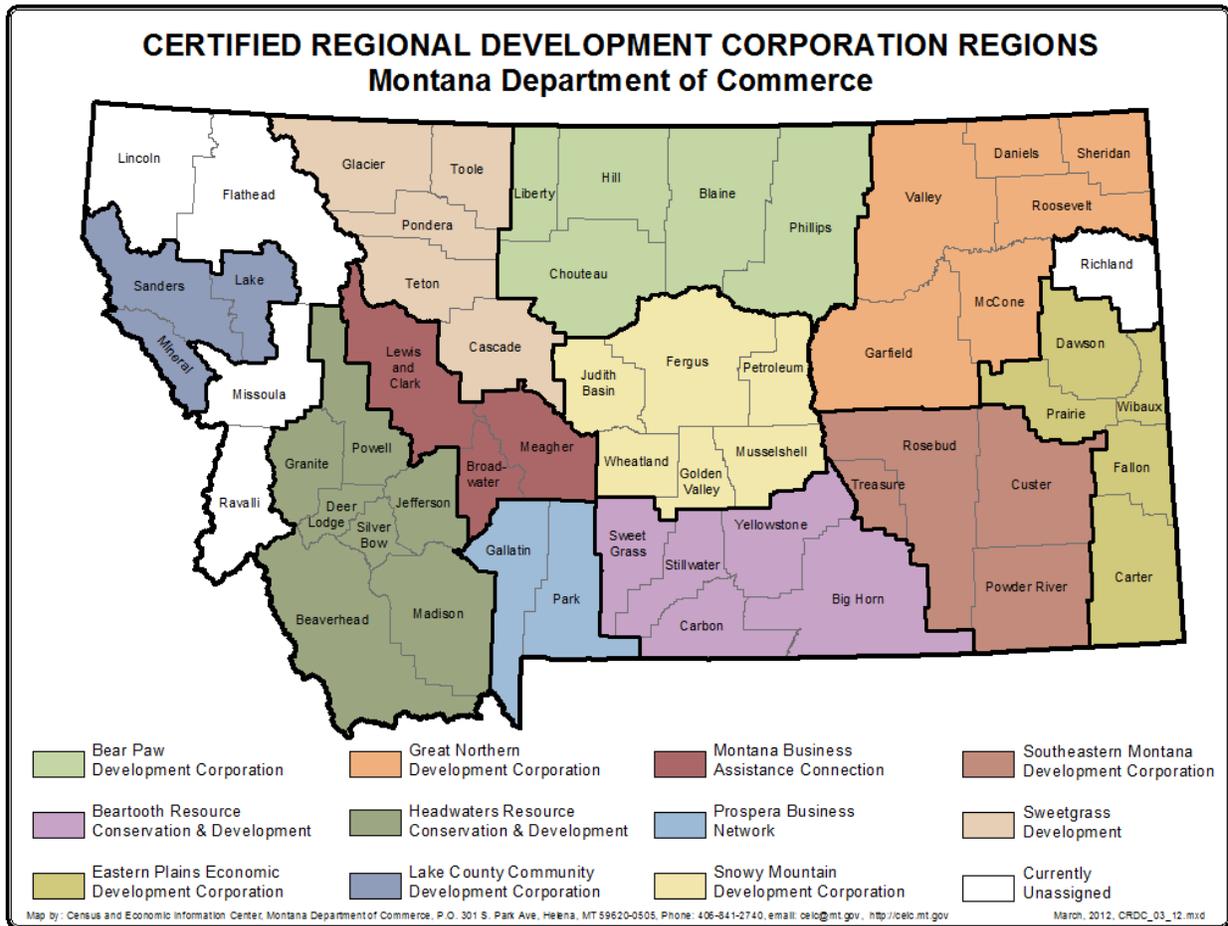
Commerce and Public Health and Human Services participate in the Montana Home Choice Coalition, resulting in better links between housing policy and disability services policy to create community living opportunities for people with disabilities. Commerce through its Section 8 and MBOH Disabled Access Programs continue to work with the Home Choice Coalition to create the opportunity for homeownership for low-income disabled households. The state, through Public Health and Human Services, continues to support initiatives to fulfill the U.S. Supreme Court Olmstead decision to create community living opportunities for people with severe disabilities currently residing in institutions.

The Home Choice Coalition advocates for and educates on the concept of Universal Design and the related concept of visitability as a standard for publicly subsidized housing in Montana. Through education and technical assistance, the Coalition expects to expand the supply of affordable housing that can be used by the maximum number of Montana citizens across the age and ability spectrum.

Former staff of the MTCoH is working with a dedicated committee to create the Montana Coalition for the Homeless. MCH will be requesting 501(c)(3) status and implementing by-laws and a governing board late this spring. The Montana Coalition for the Homeless expects to take a completely different approach than any other organizations, including the MT CoCC. The focus will be on education, advocacy and providing a voice for people who have been, or who are homeless.

CDBG-ED program will continue to expand its role in providing technical assistance in the field and through this effort, more accurately determine the degree and type of local need in community and economic development. Commerce recognizes that more outreach in education and building the capacity of communities to apply for and administer CDBG-funded projects and revolving loan funds is an ongoing need. In addition to CDBG-ED staff, the CRDCs provide ongoing technical assistance to Montana’s small businesses, give guidance to local governments in their community development efforts, and provide the capacity to maintain regional revolving loan funds.

The Certified Regional Development program encourages local governments to contract with a development organization that has qualified as a Certified Regional Development Corporation. Commerce has designated eleven CRDCs across Montana. (See map.) Most CRDCs manage regional revolving loan funds. CRDCs can provide experienced guidance to local governments in their community development efforts and provide the capacity to maintain regional revolving loan funds.



II.B.3 ISSUES STIMULATING POLICY REFINEMENT

Housing

The past few years have proven to be unprecedented in housing markets across the country, first for the precipitous rise in housing costs and homeownership, then for the dramatic losses in home values and foreclosures that resulted from the collapse of the “housing bubble,” and finally from the effect of the recession that followed. Montana has not seen the level of foreclosure activity that has characterized national media coverage, in part because Montana had less than half the national rate of sub-prime mortgage lending during the heyday of the housing bubble, so had fewer mortgages at risk. The effects of the national recession brought on by the collapse of the housing market are much more significant. Many areas of the state have had businesses fail and job losses have caused families with reasonable fixed-rate long-term mortgages to fall into foreclosure.

Montana's foreclosure rate for the years preceding the collapse of the housing market was low. For example, in 2005 only 0.2% of the residential properties in Montana had foreclosure proceedings.¹⁸ Looking at data from the Mortgage Banker Association, Montana's foreclosure rate appears to have reached its highest level of 2.01% in January 2011. Montana's foreclosure rate was 1.35% in December 2012, ranked 44th lowest in the nation in 2009. However, the foreclosures have not been distributed evenly across the state. For example, in general, foreclosure rates have hit three types of areas more heavily in Montana: the urban counties of Missoula, Cascade, and Yellowstone; counties with more rapid growth including Flathead, Gallatin, Park, Ravalli, and Lewis and Clark; and counties with Indian reservations. Some counties with the highest foreclosure rates also have been hard hit by reduced household incomes due to the economic recession.

The downturn in housing prices initially eased the gap between housing costs and what Montanans can afford in order to become homeowners. Prior to the collapse of the housing market, Montana's low- and moderate-renter households were largely unable to purchase starter homes in many of the areas of the state described above. Data from 2000 and 2006 indicated that the number of counties in which the median household income could not afford the median priced home rose from six to 28 of Montana's 56 counties between 2000 and 2006.¹⁹ By 2008, the downturn in housing prices, coupled with higher incomes, brought the cost of the median-priced home within the reach of the median household income in more counties than in 2006. However, while household incomes in many areas of Montana increased significantly from 2000 to 2008, incomes have fallen subsequently because of the recession.

The state is seeing housing markets stabilize in areas that saw a decline in home purchase prices. However, several factors make it more difficult to purchase a home. Lending criteria have been tightened considerably in the aftermath of the sub-prime lending crisis, making it more difficult for first-time homebuyers to qualify to purchase a home. Households need to have stronger credit scores and higher down payment requirements than was the case during the housing boom. These factors make it more difficult for first-time homebuyers to take advantage of the lower house costs. Finally, although low interest rates and housing prices make this appear to be a good time to buy a home, many first-time homebuyers now view homeownership as more risky, and, coupled with the uncertainty in the economy, are not seeking to purchase a home. Most first-time homebuyer households rely on wage income from younger wage earners at the lower end of the wage scale for their professions. Montana continues to rank nationally at the bottom of the wage scale, while housing purchase costs remain at about the national average.

A rising issue now in many parts of the state is the lack of housing units. Areas in eastern Montana have had relatively little growth, but are now struggling with the rapid

¹⁸ Data on foreclosures from RealtyTrac

¹⁹ Remaining data for this section, unless otherwise noted, comes from the 2010 Housing White Paper, Housing Division, Montana Department of Commerce

population growth associated with oil and gas development in the Bakken region. These communities are now seeking assistance with the maintenance and construction of new starter homes and rental housing units. In eastern Montana communities along the High Line and in oil boom areas, rental housing is essentially nonexistent. Oil and gas industry workers, as well as workforce housing for police, fire, teachers and other necessary public service workers, are faced with a shortage of rental units and a lack of ownership units in a moderate price range.

In addition, the existing housing stock in many of these areas has significant problems with disrepair. Fifteen counties in Eastern Montana have more than 15% of their housing stock in unsound condition, and there are 14 communities in eastern Montana that have more than a quarter of their housing stock in unsound condition. At the same time, in many of these same areas the cost of building a new house due to the tight employment market is much more than the home could be sold for on the market. This discourages new investment in housing.

Montana is forecast to have about 30 percent of its entire population over 65 by the year 2030, and this growing senior population is not evenly distributed over the state. The number of seniors affects the number of housing units needed in an area, as senior households typically have one or two members. More housing units are needed to house people who live alone or with one other person than are needed to house an equal number of people who live as families with children. The challenge for Montana counties is to recognize the changing demographics of who will need housing, and what type of housing will they need. As seniors age, particularly in more rural areas, they need smaller rental, assisted living, and nursing home housing units rather than single-family homes. Many of Montana counties lack sufficient housing to meet these needs.

The state's biggest challenge is to help bridge the gaps between Montana's housing needs, housing availability, and housing affordability across Montana. These gaps are likely to continue and may worsen because of a number of other trends that affect the ability of Montana communities and tribes to respond to their housing needs.

Homes within the city limits of communities that had high growth, like Missoula, Bozeman, and Kalispell, were beyond the reach of young families, many of whom bought houses in outlying rural areas miles away. The longer term forecast calls for rising gas prices, which in turn will increase the costs of commuting. Data from the Department of Energy and the Housing + Transportation Affordability Index indicate that the cost of commuting negates nearly all of the savings in lower mortgage payments for a home located far from city services and jobs. As commuting becomes more and more costly, households and communities will have to reconsider the long-term implications of building starter homes miles from the communities in which these young wage earners work.

Local governments are facing escalating costs in providing infrastructure such as water and sewer systems to their residents. Many of these systems were built prior to 1920,

and now must be replaced, adding significantly to the tax burden of existing properties and making them less affordable.

New residential development faces challenges in getting water. There are now seven closed basins in Montana, i.e., areas where all the existing water has been claimed through water rights. New development must go through the DNRC to request water permits for communal water systems. This process can take several years with no guarantee of success. Water is likely to increase as an area of challenge for future residential development.

Rough estimates indicate that about 55,000 households in Montana are below the poverty line and would benefit from having subsidized housing. Montana has about 15,700 units of housing with subsidized rents that are intended to serve not only households below the poverty line, but also working families with low-income wage earners. The supply of subsidized rental housing units does not come close to serving all those who need it. Moreover, many of Montana's subsidized housing units are on year-to-year contracts; Montana faces the potential for up to a 30% reduction in subsidized rental housing stock if owners choose to withdraw yearly contract units from the program. The alternative for many households is market rate housing, which typically consumes much more than 30% of household income, forcing people to make difficult decisions on where to spend their funds, choosing between food or rent, medicine or rent.

Mobile homes provide a relatively low cost housing alternative for lower income households. A special study of Montana's mobile homes found that as of May of 2006, 28,635 of the mobile homes in Montana were built prior to 1976, before basic safety and construction requirements were put into place. It is likely that most of these units do not meet these requirements and should be decommissioned and replaced.

The recession has also increased the level of homelessness and demand on basic services such as food banks. Homelessness imposes costs on communities far beyond the costs of shelters. A recent study in Billings found that the community spent \$31,000,000 in dealing with homeless people in one year, about \$13,000 per person.

Montana's 70,000 Native Americans struggle with many of the same housing impediments faced by other rural communities including poor economies, lack of infrastructure and scarce community agencies charged with building and renovating what little housing exists. Additionally, Indian reservations in Montana had virtually no housing resources until the early 1970s when HUD was authorized to enter into agency agreements with Tribes. This program gave some relief to the reservations but fell far short of meeting the need. Obtaining accurate information as to the actual housing need on the reservations is difficult due to varying reasons, from household reluctance to reporting actual household size in fear of loss of services to chronic under estimating Indian population during census counts. The Tribally Designated Housing Authority annual performance reports (Indian Housing Plan) indicate shortages of housing on all

of Montana's seven Indian Reservations. The shortage of housing forces many Indian families to live in towns off the reservation and commute. Others live in overcrowded conditions.²⁰ However, progress in addressing housing needs on Indian reservations face additional barriers such as: bureaucratic delays in processing paperwork; limited capacity for program implementation and management; limited funding on local, state and national levels to increase construction of new units, renovate existing units, and expand infrastructure; and economic instability in Indian communities.

Tribes are faced with housing their own enrolled Tribal members with scarce resources, and get no additional funds to also house their non-enrolled Tribal Descendants, members of other federally recognized Tribes and their descendants, and the non-Indian community. The shortage of affordable rental housing on reservations has made overcrowding common on all Montana reservations. Frequently, extended families have twenty or more persons living in a 1,200 square foot house. Overcrowding contributes to the decline in the condition and value of these homes, and dollars for rehab are in short supply.²¹

Homelessness

Homeless assistance efforts in Montana are provided through a combination of private and publicly funded programs. All emergency shelters are privately operated in Montana. Unlike many other areas in the nation, Montana has no city- or state-funded shelters. Of the 716 inventoried, year-round shelter beds in the state, faith-based organizations provide for 54 percent and domestic violence shelters for about 30 percent of all beds.

Transitional housing and permanent supportive housing for seriously disabled homeless, however, are predominantly funded through federal homeless programs. Of the 691 transitional housing beds, 79 percent are completely or partially funded by McKinney-Vento CoC grants and the Veterans Administration Grants Per Diem program.

All of the 666 permanent supportive housing beds are federally funded with 85% of them being permanent supportive housing beds for disabled and 15% being Rapid Rehousing beds funded by either the VA Supportive Services for Veteran Families grants or the Emergency Solutions Program grant.

Currently, neither TANF nor Medicaid are used to provide homeless housing assistance.

All of the housing programs above are required to assist clients in accessing cash benefits from mainstream programs that include: Supplemental Security Income, Social Security Disability Insurance, Veterans Disability, TANF, retirement and pensions or child support. These programs also assist clients to access non-cash mainstream

²⁰ Montana Indian Homeownership Task Force, spring, 2008

²¹ Montana Indian Homeownership Task Force

benefits from Medicaid, Medicare, State children's health insurance, WIC, VA medical services, TANF childcare, temporary rental assistance, and Section 8 or other public rental assistance.

There are also many vitals programs providing other services to the homeless, such as:

- Health Care for the Homeless (HCH) is a federally funded HRSA program that provides temporary medical services to homeless individuals and families. There are two clinics in Billings and Missoula and six satellite service sites in Billings, Butte, and Helena.
- The SAMSHA-funded PATH program provides critical street outreach and homeless program enrollment in Billings, Butte, and Missoula. The PATH program also coordinates the SOARS training which helps all homeless case managers successfully assist homeless clients apply for SSI and SSDI assistance.
- Volunteers of America, Billings, is a recent recipient of a Veterans Administration's Supportive Services for Homeless Veteran Families grant which provides services and some rental assistance to veteran households in the Billings area.
- The 10 Human Resource Development Councils provide a statewide network of no-wrong-door accessibility to homeless assistance, including short-term rental assistance, emergency shelter, food banks, and referral assistance to a myriad of other programs.

The Montana Continuum of Care Coalition and local community CoC groups are providing community and state-level planning and resource coordination in order to maximize the use of all homeless programs and to ensure that Montana remains competitive in securing approximately \$2.8 million in McKinney-Vento grants each year for transitional housing and permanent supportive housing. The Coalition also conducts the annual homeless survey and inventory, oversees the statewide Homeless Management Information System (a data bank for homeless programs), analyzes performance data of homeless programs, and is developing a 10-year strategic plan and a coordinated assessment system to more effectively address homelessness in Montana.

Infrastructure and Public Facilities

Montana's local government planning law encourages communities to develop growth policies (also known as comprehensive plans or master plans) to guide development in their jurisdictions and coordinate policies relating to land use, housing, public facilities, and economic development. Growth policies can be implemented through the adoption of zoning ordinances or capital improvements programs and construction. Montana's CDBG Housing and Public Facilities program supports each community's desire to further develop planning through funding and technical assistance. During the 2014 Plan Year, CDBG awarded \$507,150 in planning grant funds to assist communities with planning and technical assistance grants.

With the assistance of the Community Technical Assistance Program (CTAP) staff, all Montana communities have access to planning and engineering expertise enhancing the preparation of planning documents. In addition to the CTAP staff, the Montana Main Street Program, also administered by the Community Development Division, is a tool to further the impact of CDBG planning grants and identification of the community needs.

Economic Development

According to local officials, the cost of preparing planning studies often presents a serious obstacle for communities with limited resources. The CDBG-ED program is able to play a unique role in assisting Montana communities because of its ability to offer planning grants to local governments. These grants were available for a variety of planning activities, including the initial planning necessary to develop a CDBG-ED project, or to prepare an economic development strategy, or similar planning efforts needed to help a community address critical business needs.

For program year 2014, Commerce set aside up to \$108,000 of CDBG funds from the economic development category for technical assistance grants. Applications were accepted on a first-come, first-serve basis. Local governments could propose that CDBG-ED technical assistance funds be used for preparing plans, studies, analyses, or research related to economic development such as:

- Preparing community needs assessments, action plans, or implementation strategies with a focus on economic development
- Conducting income surveys necessary to complete a CDBG-ED application
- Preparing feasibility studies, preliminary environmental assessments for the purpose of grant applications or Preliminary Architectural Reports for reuse of underutilized, empty or abandoned buildings and industrial or manufacturing facilities
- Preparing funding applications for economic development projects (should not be the only planning activity proposed in the application)
- Preparing Preliminary Engineering Reports, or for related activities normally associated with preliminary engineering such as surveys, studies and data collection in support of an economic development project only

CDBG-ED planning grants were available in amounts up to \$25,000. Local governments had to provide a match on a \$1 for \$1 basis that would be firmly committed by the time CDBG-ED funds were released. Firm loan commitments, such as funds borrowed from another state or federal program or from a local bank, were acceptable forms of match. Grants or other cash contributions from other local, state, or federal agencies or programs or private foundations were also acceptable forms of match.

Two awards were for planning activities under the CDBG-ED Program for the 2014 program year.

SECTION C – PERFORMANCE MEASUREMENT

In September 2003, HUD issued *CPD Notice 03-09* regarding performance measurement. In the notice, HUD strongly encouraged each CPD formula grantee, which includes Montana's HOME, CDBG, and ESG programs, to develop and use a performance measurement system. In addition, it described the need for HUD to begin to show the results of the federal dollars spent on the activities funded by the CDBG, HOME, and ESG programs. On June 10, 2005, HUD published the *Notice of Draft Outcome Performance Measurement System for Community Planning and Development Formula Grant Programs* in the Federal Register. The final rule was published in the March 7, 2006 Federal Register. As described in the Federal Register, the proposed outcome performance measurement system should enable HUD to collect information on the outcomes of activities funded with CPD formula grant assistance and to aggregate that information at the national, state, and local level.

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.

	Outcome 1: Availability or Accessibility	Outcome 2: Affordability	Outcome 3: Sustainability
Objective 1: 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)
Objective 2: 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)
Objective 3: 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 activity, project, and program funded by the three formula grant programs covered by the Consolidated Plan will meet the requirements of the framework. Beginning with the FFY 2007 Annual Action Plan, the three formula grant programs adopted the following specific annual objectives:

**Table 3A - Summary of Specific Annual Objectives
Plan Years 2010, 2011, 2012, 2014 and 2014**

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Expected Nmbr ^{22, 23}	Actual Nmbr ^{24, 25, 26}	Percent Completed	
	Specific Annual Objectives						
DH-1	Availability/Accessibility of Decent Housing						
DH-1.1	Enhance the availability / accessibility of decent housing through assistance for acquisition/new construction of rental and homeownership units for LMI households	CDBG	2010	Number of units acquired and newly constructed	0	48	100%
			2011		0	74	100%
			2012		12	0	n.a.
			2013		12	33	100%
			2014		0	0	n.a.
			FIVE-YEAR TOTAL				24

Please Note: "n.a." is defined as no project applications being received by the grant program.

²² HOME and CDBG grant funds are primarily distributed through competitive and/or first-come, first-serve processes, and the state cannot accurately predict the number 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.

²⁴ Sources: IDIS Report CO4PR83, **CDBG** Performance Measures Report for Program Year 2010 and IDIS Report CO4PR81, **ESG** Performance Measures Report for Program Year 2010

²⁴ CDBG Actual Number of units or households served is based on the project activities awarded but may not necessarily be reflected in the IDIS Reports since final actual beneficiaries served are reported during project closeout. Once project activities are completed and entered into IDIS, the Percent Completed will be entered.

²⁶ Source: IDIS Report PR85-Housing Performance Report Program Years 2010 (4/1/10-3/31/11) & 2011 (4/1/11-3/31/12). Note: PR-85 Housing Performance Report Program Years 2010 (4/1/10-3/31/11) & 2011 (4/1/11-3/31/12) for the purposes of this report although the detail data were entered into IDIS.

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Expected Nmbr ^{22, 23}	Actual Nmbr ^{24, 25, 26}	Percent Completed
	Specific Annual Objectives					
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 Local Match: 5% <i>minimum required</i>	2010	40	8	100%
			▪ Number of units rehabilitated			
			▪ # of units meeting Section 504 standards			
			▪ # of units qualified as Energy Star			
			2011	40	12	100%
			▪ Number of units rehabilitated			
			▪ # of units meeting Section 504 standards			
			▪ # of units qualified as Energy Star			
			2012	40	36	100%
			▪ Number of units rehabilitated			
			▪ # of units meeting Section 504 standards			
			▪ # of units qualified as Energy Star			
			2013	40	11	100%
			▪ Number of units rehabilitated			
			▪ # of units meeting Section 504 standards			
▪ # of units qualified as Energy Star						
2014	0	0	n.a.			
▪ Number of units rehabilitated						
▪ # of units meeting Section 504 standards						
▪ # of units qualified as Energy Star						
FIVE-YEAR TOTAL				160	67	n.a.

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Expected Nnbr ^{22, 23}	Actual Nnbr ^{24, 25, 26}	Percent Completed
	Specific Annual Objectives					
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	2010 ▪ Number of households provided with rental assistance	50	202	100%
			2011 ▪ Number of households provided with rental assistance	50	0	n.a.
			2012 ▪ Number of households provided with rental assistance	50	0	n.a.
			2013 ▪ Number of households provided with rental assistance	50	0	n.a.
			2014 ▪ Number of households provided with rental assistance	0	0	n.a.
			FIVE-YEAR TOTAL	200	202	n.a.
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	2010 ▪ Number of rental units assisted	115	133	100%
			▪ # of units meeting Section 504 standards			
			2011 ▪ Number of rental units assisted	115	39	100%
			▪ # of units meeting Section 504 standards			
			2012 ▪ Number of rental units assisted	115	4	100%
			▪ # of units meeting Section 504 standards			
			2013 ▪ Number of rental units assisted	115	58	100%
			▪ # of units meeting Section 504 standards			
			2014 ▪ Number of rental units assisted	115	0	n.a.
▪ # of units meeting Section 504 standards						
FIVE-YEAR TOTAL	460	234	n.a.			

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Expected Nmbr ^{22, 23}	Actual Nmbr ^{24, 25, 26}	Percent Completed
	Specific Annual Objectives					
DH-2.5	Address the need for affordable decent housing through down payment and closing cost assistance to low- and moderate -income households	CDBG	2010 ▪ Number of households receiving homebuyer assistance	4	0	n.a.
			2011 ▪ Number of households receiving homebuyer assistance	4	0	n.a.
			2012 ▪ Number of households receiving homebuyer assistance	0	0	n.a.
			2013 ▪ Number of households receiving homebuyer assistance	0	27	100%
			2014 ▪ Number of households receiving homebuyer assistance	0	0	n.a.
			FIVE-YEAR TOTAL	8	39	n.a.
DH-2.6	Address the need of families facing the possibility of homelessness by providing payments for utilities, rent, or deposits through homeless prevention and rapid re-housing programs and services	ESG	2010 ▪ Number of individuals receiving one-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	5,000	6,049	120%
			2011 ▪ Number of individuals receiving one-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	5,000	6,485	129%
			2012 ▪ Number of individuals receiving 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	500	534	n.a.
			2013 Number of individuals receiving 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			See 2013 CAPER ESG Attachment
			2014 Number of individuals receiving 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	See ESG Attachment	See ESG Attachment	See ESG Attachment

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Expected Nmbr ^{22, 23}	Actual Nmbr ^{24, 25, 26}	Percent Completed
	Specific Annual Objectives					
			FOUR-YEAR TOTAL	5,000	6,049	120%
DH-3 Sustainability of Decent Housing						
DH-3.1	Improve the <u>sustainability</u> of decent housing through the <u>rehabilitation</u> of homeowner units to benefit LMI households.	CDBG	2010 ▪ Number of LMI households assisted	50	4	100%
			2011 ▪ Number of LMI households assisted	50	0	n.a.
			2012 ▪ Number of LMI households assisted	0	0	n.a.
			2013 ▪ Number of LMI households assisted	0	0	n.a.
			2014 ▪ Number of LMI households assisted	0	5	n.a.
			FIVE-YEAR TOTAL	100	9	n.a.
SL-1 Availability/Accessibility of Suitable Living Environment						
SL-1.1	Enhance the <u>availability / accessibility</u> of <u>suitable living environments</u> through the new construction of public facilities to benefit a geographic area with an LMI percentage of 51% or higher	CDBG	2010 ▪ Number of <u>persons</u> with new/improved access to the public facility or receiving a service provided by the public facility that is no longer substandard	230	821	100%
			2011 ▪ Number of <u>persons</u> with new/improved access to the public facility or receiving a service provided by the public facility that is no longer substandard	230	667	100%
			2012 ▪ Number of <u>persons</u> with new/improved access to the public facility or receiving a service provided by the public facility that is no longer substandard	230	1,377	100%
			2013 ▪ Number of <u>persons</u> with <u>new or improved access</u> to the public facility or receiving a service provided by the public facility that is <u>no longer substandard</u>	300	3,130	100%
			2014 ▪ Number of <u>persons</u> with <u>new or improved access</u> to the public facility or receiving a service provided by the public facility that is no longer substandard	n.a.	n.a.	n.a.

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Expected Nmbr ^{22, 23}	Actual Nmbr ^{24, 25, 26}	Percent Completed
	Specific Annual Objectives					
			FIVE-YEAR TOTAL	990	5,995	n.a.
SL-1.2	Enhance availability/ accessibility of decent housing by offering new construction & rehabilitation of non-rental shelters ²⁷ to LMI households	CDBG	2010 ▪ Number of units constructed and rehabilitated	0	0	n.a.
			2011 ▪ Number of units constructed and rehabilitated	0	0	n.a.
			2012 ▪ Number of units constructed and rehabilitated	0	0	n.a.
			2013 ▪ Number of units constructed and rehabilitated	0	336	100%
			2014 ▪ Number of units constructed and rehabilitated	143	91	n.a.
			FIVE-YEAR TOTAL	0	336	n.a.
SL-1.3	Enhance suitable living environment through availability and accessibility of essential services for the homeless	ESG	2010 ▪ Number of individuals assisted with essential services such as shelter, food and individual support services	690	595	93%
			2011 ▪ Number of individuals assisted with essential services such as shelter, food and individual support services	690	492	71%
			2012 ▪ Number of individuals assisted with essential services such as shelter, food and individual support services	n.a.	7,537	n.a.
			2013 ▪ Number of individuals assisted with essential services such as shelter, food and individual support services	n.a.	n.a.	See 2013 CAPER ESG Attachment
			2014 ▪ Number of individuals assisted with essential services such as shelter, food and individual support services	n.a.	n.a.	See ESG Attachment
						FOUR-YEAR TOTAL

²⁷ Youth group homes, domestic violence facilities, mental health facilities, homeless shelters, etc.

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Expected Nmbr ^{22, 23}	Actual Nmbr ^{24, 25, 26}	Percent Completed	
	Specific Annual Objectives						
			2011 ▪ Number of units constructed and rehabilitated	0	24	0%	
			2012 ▪ Number of units constructed and rehabilitated	n.a.	n.a.	n.a.	
			2014 ▪ Number of units constructed and rehabilitated	n.a.	n.a.	n.a.	
			FOUR-YEAR TOTAL	0	24	0%	
SL-2	Affordability of Suitable Living Environment						
SL-2.1	Improve the <u>affordability</u> of suitable living environment through <u>rehabilitation</u> of existing or <u>new construction</u> of public facilities ²⁸ by targeting direct benefits to serve a specific LMI clientele.	CDBG	2010 ▪ Number of <u>persons</u> with improved/new access to the public facility or receiving a service provided by the public facility that is no longer substandard	220	855	100%	
2011 ▪ Number of <u>persons</u> with improved/new access to the public facility or receiving a service provided by the public facility that is no longer substandard			220	45	100%		
2012 ▪ Number of <u>persons</u> with improved/new access to the public facility or receiving a service provided by the public facility that is no longer substandard			50	0	n.a.		
2013 ▪ Number of <u>persons</u> with improved/new access to the public facility or receiving a service provided by the public facility that is no longer substandard			25	4,200	100%		
2014 ▪ Number of persons with improved/new access to the public facility or receiving a service provided by the public facility that is no longer substandard			7,023	7,023	n.a.		
FIVE-YEAR TOTAL (PERSONS)			515	5,100	n.a.		

²⁸ Water and wastewater projects, nursing homes, Head Start centers, senior centers, county hospitals, etc.

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Expected Nmbr ^{22, 23}	Actual Nmbr ^{24, 25, 26}	Percent Completed
	Specific Annual Objectives					
SL-3	Sustainability of Suitable Living Environment					
SL-3.1	Improve the sustainability of suitable living environments through rehabilitation of existing public facilities ²⁹ to benefit a geographic area with an LMI percentage of 51% or higher	CDBG	2010 ▪ Number of <u>households</u> with new/improved access to the public facility or receiving a service provided by the public facility that is no longer substandard	2400	7,790	100%
			2011 ▪ Number of <u>persons</u> with new/improved access to the public facility or receiving a service provided by the public facility that is no longer substandard	2400	60	100%
			2012 ▪ Number of <u>persons</u> with new/improved access to the public facility or receiving a service provided by the public facility that is no longer substandard	1000	0	n.a.
			2013 ▪ Number of <u>persons</u> with new/improved access to the public facility or receiving a service provided by the public facility that is no longer substandard	1000	3,077	100%
			2014 ▪ Number of <u>persons</u> with new/improved access to the public facility or receiving a service provided by the public facility that is no longer substandard	75	75	n.a.
			FIVE-YEAR TOTAL (PERSONS)	6,800	10,927	n.a.

²⁹ Water and wastewater projects

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Expected Nmbr ^{22, 23}	Actual Nmbr ^{24, 25, 26}	Percent Completed		
	Specific Annual Objectives							
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	2010 ▪ Number of emergency shelters/domestic violence facilities assisted that provide shelter, food and individual support services through Shelter Maintenance funding	23	23	100%		
			2011 ▪ Number of emergency shelters/domestic violence facilities assisted that provide shelter, food and individual support services through Shelter Maintenance funding	23	23	100%		
			2012 ▪ Number of emergency shelters/domestic violence facilities assisted that provide shelter, food and individual support services through Shelter Maintenance funding	23	8	100%		
			2013 ▪ Number of emergency shelters/domestic violence facilities assisted that provide shelter, food and individual support services through Shelter Maintenance funding			See 2013 CAPER ESG Attachment		
			2014 Number of emergency shelters/domestic violence facilities assisted that provide shelter, food and individual support services through Shelter Maintenance funding			See ESG Attachment		
			FOUR-YEAR TOTAL			23	23	100%

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Expected Nmbr ^{22, 23}	Actual Nmbr ^{24, 25, 26}	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	2010			
			▪ Number of businesses assisted with loans/grants	1	0	100%
			▪ <i>Number of new businesses assisted</i>		0	
			▪ <i>Number of existing businesses assisted</i>		1	
			▪ <i>Number of jobs created</i>		33	
			▪ <i>Number of jobs retained</i>		0	
			2011			
			▪ Number of businesses assisted with loans/grants	1	2	200%
			▪ <i>Number of new businesses assisted</i>		0	
			▪ <i>Number of existing businesses assisted</i>		2	
			▪ <i>Number of jobs created</i>		0	
			▪ <i>Number of jobs retained</i>		133	
			2012			
			▪ Number of businesses assisted with loans/grants	1	2	100%
			▪ <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>						
2014						
▪ Number of businesses assisted with loans/grants	2	0	0%			
▪ <i>Number of new businesses assisted</i>		0				
▪ <i>Number of existing businesses assisted</i>		0				
▪ <i>Number of jobs created</i>		0				
▪ <i>Number of jobs retained</i>		0				
FOUR-YEAR TOTAL				4	4	100%

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Expected Nmbr ^{22, 23}	Actual Nmbr ^{24, 25, 26}	Percent Completed
	Specific Annual Objectives					
EO-2	Affordability of Economic Opportunity					
EO-2.1	Provide economic opportunity through improved or new <u>affordability</u>	CDBG	2010			
			▪ Number of businesses assisted with loans/grants	3	3	100%
			▪ <i>Number of new businesses assisted</i>		0	
			▪ <i>Number of existing businesses assisted</i>		3	
			▪ <i>Number of jobs created</i>		26	
			▪ <i>Number of jobs retained</i>		86	
			2011			
			▪ Number of businesses assisted with loans/grants	2	2	100%
			▪ <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>			
			2012			
			▪ Number of businesses assisted with loans/grants	2	0	
			▪ <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>			
			2014			
			▪ Number of businesses assisted with loans/grants	2	2	100%
▪ <i>Number of new businesses assisted</i>		0				
▪ <i>Number of existing businesses assisted</i>		2				
▪ <i>Number of jobs created</i>		13				
▪ <i>Number of jobs retained</i>		5				
FOUR-YEAR TOTAL				9	7	100%

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Expected Nmbr ^{22, 23}	Actual Nmbr ^{24, 25, 26}	Percent Completed
	Specific Annual Objectives					
EO-3	Sustainability of Economic Opportunity					
EO-3.1	Provide economic opportunity through improved or new sustainability	CDBG	2010			
			▪ Number of <u>businesses</u> assisted with loans/grants	3	4	125%
			▪ <i>Number of new businesses assisted</i>		1	
			▪ <i>Number of existing businesses assisted</i>		3	
			▪ <i>Number of jobs created</i>		65	
			▪ <i>Number of jobs retained</i>		36	
			2011			
			▪ Number of <u>businesses</u> assisted with loans/grants	3	3	100%
			▪ <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>			
			2012			
			▪ Number of <u>businesses</u> assisted with loans/grants	2	1	50%
			▪ <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>						
2014						
▪ Number of <u>businesses</u> assisted with loans/grants	2	0	%.			
▪ <i>Number of new businesses assisted</i>		0				
▪ <i>Number of existing businesses assisted</i>		0				
▪ <i>Number of jobs created</i>		0				
▪ <i>Number of jobs retained</i>		0				
FOUR-YEAR TOTAL				10	9	100%
EO-3.2	Provide economic opportunity through improved or new sustainability	CDBG	2009			
			▪ Number of <u>persons</u> assisted with a new/continuing access to a (public) service	n.a.	60	n.a.
			2010			
			Number of <u>persons</u> assisted with a new/continuing access to a (public) service	n.a.	3	n.a.
CR-1	Community Revitalization					
	Not applicable					

O-1

**PART III – MONTANA STATE SUMMARY OF CONSOLIDATED
PLAN PROJECTS FOR REPORT YEAR 2014**

IDIS–PR06: Summary of Consolidated Plan Projects for Report Year
(Available in IDIS)

APRIL 1, 2014 TO MARCH 31, 2015

Report to HUD

PART IV – HOME ANNUAL PERFORMANCE REPORT

**Form HUD-40107
HOME Match Report – form HUD-40107-A
FHEO 504 Review
FHEO HOME Review**

Section 3 Summary Report – HUD Form 60002 (HOME)

**IDIS-PR22: Status of HOME Activities
IDIS-PR25: Status of CHDO Funds by Fiscal Year Report
IDIS-PR27: Status of HOME Grants Report
IDIS-PR33: HOME Matching Liability Report
*(Available in IDIS)***

APRIL 1, 2014 TO MARCH 31, 2015

REPORT TO HUD

PART V - CDBG ANNUAL PERFORMANCE REPORTS

Section 3 Summary Report – HUD Form 60002 (CDBG)

**IDIS–PR26: CDBG Financial Summary Report
Program Year 2012**

IDIS–PR28: CDBG State PER Report
(Available in IDIS)

APRIL 1, 2014 TO MARCH 31, 2015

REPORT TO HUD

EXHIBIT A – ESG ADDITIONAL INFORMATION

CR-60 - ESG 91.520(G) (ESG RECIPIENTS ONLY)
ESG Supplement to the CAPER in e-snaps
For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	MONTANA
Organizational DUNS Number	809790579
EIN/TIN Number	810302402
Identify the Field Office	DENVER
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Montana CoC

ESG Contact Name

Prefix	Mrs
First Name	Marcia
Middle Name	
Last Name	Lemon
Suffix	
Title	Energy and Community Services Manager

ESG Contact Address

Street Address 1	1400 Carter Dr
Street Address 2	
City	Helena
State	MT
ZIP Code	59601
Phone Number	(406) 447-4276
Extension	
Fax Number	(406) 447-4287
Email Address	mlemon@mt.gov

ESG Secondary Contact

Prefix	Ms
First Name	Julianna
Last Name	Crowley
Suffix	
Title	Community Services Program Officer
Phone Number	(406) 329-1612
Extension	
Email Address	jcrowley@mt.gov

2. Reporting Period—All Recipients Complete

Program Year Start Date	04/01/2014
--------------------------------	------------

Program Year End Date

03/31/2015

3a.

Subrecipient or Contractor Name: NORTHWEST MONTANA HUMAN RESOURCES

City: Kalispell

State: MT

Zip Code: 59903, 1058

DUNS Number:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 87922

Subrecipient or Contractor Name: HRDC OF DISTRICT IX, INC

City: Bozeman

State: MT

Zip Code: 59715, 6241

DUNS Number:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 67294

Subrecipient or Contractor Name: HUMAN RESOURCES DEVELOPMENT COUNCIL

City: Missoula

State: MT

Zip Code: 59801, 5763

DUNS Number: 098711542

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 93428

Subrecipient or Contractor Name: HUMAN RESOURCES COUNCIL DIST XII

City: Butte

State: MT

Zip Code: 59701, 9362

DUNS Number: 023480189

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 49632

Subrecipient or Contractor Name: ROCKY MOUNTAIN DEVLPMNT COUNCIL INC

City: Helena

State: MT

Zip Code: 59624, 1717

DUNS Number:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 38412

Subrecipient or Contractor Name: DISTRICT IV HRDC

City: Havre

State: MT

Zip Code: 59501, 4960

DUNS Number:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 17256

Subrecipient or Contractor Name: ACTION FOR EASTERN MONTANA

City: Glendive

State: MT

Zip Code: 59330, 1309

DUNS Number:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 22994

Subrecipient or Contractor Name: HRDC DISTRICT 7

City: Billings

State: MT

Zip Code: 59101, 2114

DUNS Number: 173851387

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 94574

Subrecipient or Contractor Name: HRDC VI

City: Lewistown

State: MT

Zip Code: 59457, 1700

DUNS Number:

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 12265

Subrecipient or Contractor Name: OPPORTUNITIES INCORPORATED

City: Great Falls

State: MT

Zip Code: 59401, 2605

DUNS Number: 119747665

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 74923

CR-65 - PERSONS ASSISTED

4. Persons Served

4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	209
Children	213
Don't Know/Refused/Other	0
Missing Information	0
Total	422

Table 2 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	318
Children	209
Don't Know/Refused/Other	3
Missing Information	0
Total	530

Table 3 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

Number of Persons in Households	Total
Adults	0
Children	1
Don't Know/Refused/Other	0
Missing Information	0
Total	1

Table 4 – Shelter Information

4d. Street Outreach

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 5 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	523
Children	420
Don't Know/Refused/Other	3
Missing Information	0
Total	946

Table 6 – Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

	Total
Male	378
Female	566
Transgender	1
Don't Know/Refused/Other	0
Missing Information	1
Total	946

Table 7 – Gender Information

6. Age—Complete for All Activities

	Total
Under 18	420
18-24	72
25 and over	451
Don't Know/Refused/Other	3
Missing Information	0
Total	946

Table 8 – Age Information

7. Special Populations Served—Complete for All Activities
Number of Persons in Households

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans	29	5	24	0
Victims of Domestic Violence	53	14	39	0
Elderly	25	9	16	0
HIV/AIDS	0	0	0	0
Chronically Homeless	26	0	21	0
Persons with Disabilities:				
Severely Mentally Ill	172	72	100	0
Chronic Substance Abuse	44	15	29	0
Other Disability	182	87	96	0
Total (Unduplicated if possible)	0	0	0	0

Table 9 – Special Population Served

Race:	ESG Persons Served
White	628
Black or African American	41
Asian	2
American Indian or American Native	154
Native Hawaiian or Other Pacific Islander	3
Multi-Race	16
Total	844
Ethnicity:	
Hispanic	52

Not Hispanic	792
Total	844

Table 10 - CR-10 - Racial and Ethnic composition of families assisted

CR-70 – ESG 91.520(G) - ASSISTANCE PROVIDED AND OUTCOMES

8. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	25,550
Total Number of bed-nights provided	25,550
Capacity Utilization	0.00%

Table 11 – Shelter Capacity

9. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

DH-2.6 - Address the need of families facing the possibility of homelessness by providing payments for utilities, rent or deposits through homeless prevention/rapid rehousing programs and services.

- Number of individuals receiving payments for utilities, rent, or deposits for families facing eviction/shut-off or to provide security/utility deposits, applications fees or rental assistance to enable families to move into a dwelling of their own.
Expected Number: 875 Actual Number:946 Percent Completed: 108%

SL-1.3 - Enhance suitable living environment through availability and accessibility of essential services for the homeless.

We were unable to obtain an accurate count on the unduplicated number of individuals assisted using ESG funds at the shelters benefiting from ESG funds. With the focus on Homeless Prevention and Rapid Rehousing, only District IV Human Resource Development Council continues to provide ‘Essential Service’ support to its shelter. The other two agencies that fund shelters, District VII and District XII Human Resource Development Councils provide Emergency Shelter Operations support.

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.

- Number of emergency shelters/domestic violence facilities assisted that provide shelter, food and individual support services through Shelter Maintenance funding.
- Expected Number: 6
- Actual Number: 3
- Percent Completed: 50%

Agencies receiving ESG funds have continued to focus funding on Rapid Rehousing and Homeless Prevention activities. There are three agencies that receive funding that

they have allocated to Shelter Services and only one of those three fund Essential Services.

They are:

1. District IV Human Resource Development Council - Funds Shelter Operations and Essential Services
2. District VII Human Resource Development Council - Funds Shelter Operations
3. District XII Human Resource Development Council - Funds Shelter Operations

CR-75 – EXPENDITURES

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2012	2013	2014
Expenditures for Rental Assistance	0	55,796	69,970
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	12,265	24,088
Expenditures for Housing Relocation & Stabilization Services - Services	0	24,433	59,905
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
Subtotal Homelessness Prevention	0	92,494	153,963

Table 12 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2012	2013	2014
Expenditures for Rental Assistance	0	27,395	44,299
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	38,542	81,992
Expenditures for Housing Relocation & Stabilization Services - Services	0	45,735	116,383
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
Subtotal Rapid Re-Housing	0	111,672	242,674

Table 13 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2012	2013	2014
Essential Services	0	1,862	2,119
Operations	0	179	40,577
Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
Subtotal	0	2,041	42,696

Table 14 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2012	2013	2014
HMIS	0	53,607	21,851
Administration	0	8,423	37,196
Street Outreach	0	0	0

Table 15 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2012	2013	2014
766,617	0	268,237	498,380

Table 16 - Total ESG Funds Expended

11f. Match Source

	2012	2013	2014
Other Non-ESG HUD Funds	0	626	0
Other Federal Funds	0	64,306	130,436
State Government	0	0	0
Local Government	0	69,120	116,561
Private Funds	0	80,662	245,901
Other	0	2,437	0
Fees	0	0	0
Program Income	0	0	0
Total Match Amount	0	217,151	492,898

Table 17 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2012	2013	2014
1,417,619	0	485,388	991,278

Table 18 - Total Amount of Funds Expended on ESG Activities