Governor Steve Bullock

State of Montana

Annual Action Plan

April 1, 2016 through March 31, 2017

MONTANA
DEPARTMENT OF COMMERCE

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DRAFT
Public Comment Period
March 3 – April 4, 2016

Public Hearing:
March 25, 2016

EQUAL HOUSING OPPORTUNITY

The Montana Department of Commerce will provide alternative accessible formats of this document upon request. If you need this document in an alternative format such as large print, Braille, audiotape, or computer diskette, please contact the Department.

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Annual Action Plan

Process

AP-05 Executive Summary

Introduction

The State of Montana's 2016-2017 Annual Action Plan serves as the application to the the U.S. Department of Housing and Urban Development (HUD) for funding of the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and National Housing Trust Fund (HTF) programs for Plan Year Two of the 2015-2020 Montana Consolidated Plan for Housing and Community Development (2015-2020 Consolidated Plan). The 2016-2017 Annual Action Plan and 2015-2020 Consolidated Plan comprehensively fulfill three basic goals in Montana: provide decent housing, provide a suitable living environment, and expand economic opportunities.

The Annual Action Plan describes to HUD any changes or trends in Montana's housing, homeless, special needs populations, community development, and economic development needs during the period since the submission of the 2015-2020 Consolidated Plan. The 2016-2017 Annual Action Plan also summarizes the actions Montana will take to support the strategic goals identified in the Consolidated Plan during Plan Year Two, from April 1, 2016 through March 31, 2016.

Summarize the objectives and outcomes identified in the Plan

The following list presents the objectives and outcomes of the 2015-2020 Consolidated Plan the State of Montana will pursue over Plan Year Two:

1. *Support existing Montana communities:*
    a. Target funding toward existing communities to increase community revitalization, improve the efficiency of public works investments, and safeguard rural landscapes and natural resources;
    b. Encourage appropriate and comprehensive planning, market studies, preliminary architectural reports, and other studies or plans that support the sustainability of local communities, affordable housing, public works investments, vital employment centers, and the environment;
    c. Enhance the unique and resilient characteristics of all communities by investing in healthy, safe, and walkable neighborhoods—rural, urban, or suburban;
    d. Encourage the rehabilitation of existing rental and owner-occupied homes, particularly for those with special needs and the elderly;

e. Encourage the development and rehabilitation of community facilities and services located within walkable neighborhoods and/or served by public transportation systems, particularly for those with special needs and the elderly.

2. *Invest in vital public infrastructure:*
   a. Encourage appropriate and comprehensive pre-development planning activities for public infrastructure, including asset management, needs analysis, preliminary engineering and/or architectural reports, and other studies or plans;
   b. Provide funding opportunities to improve the safety and efficiency of public infrastructure, promote healthy, safe, and walkable neighborhoods, and safeguard the environment; and
   c. Provide funding opportunities to serve eligible Montanans, particularly those with special needs and elderly populations, with safe, efficient public infrastructure.

3. *Enhance Montana's economic competitiveness:*
   a. Provide reliable and timely access to employment centers, educational opportunities, services and other basic needs by workers as well as expanded business access to markets;
   b. Support comprehensive planning for downtown revitalization, business development, and other studies or plans to attract and retain talent in Montana communities;
   c. Provide job opportunities to eligible Montanans to strengthen communities within the State;
   d. Encourage activities that support and strengthen new and existing businesses, particularly those located within traditional downtown business centers comprising a mix of businesses, housing, and services;
   e. Encourage mixed-use development that contributes to broader revitalization efforts in Montana communities; and
   f. Seek opportunities to achieve multiple economic development goals, such as removing barriers to collaboration, leveraging multiple funding sources, and increasing energy efficiency, through a single investment.

4. *Promote equitable, affordable housing in Montana*
   a. Expand location- and energy-efficient housing choices for people of all ages, incomes, races and ethnicities to increase mobility and lower the combined cost of housing and transportation;
   b. Encourage housing activities that incorporate energy-efficient design to help advance solar deployment and other on-site renewable energy installations in affordable housing that is aligned with the Federal Renewable Energy Target;
   c. Encourage activities to acquire and/or construct new affordable housing for homeownership or rental in areas where existing investment in infrastructure, facilities, and services leverages multiple economic, environmental, and community objectives;

d. Encourage appropriate and comprehensive planning, market studies, preliminary architectural reports, and other studies or plans in support of the efficient construction of affordable housing;
e. Encourage financial mechanisms that increase homeownership opportunities and provide rental assistance to eligible Montanans, particularly those with special needs and the elderly.

5. *Reduce homelessness in Montana:*
   a. Encourage activities that address the housing needs of homeless Montanans and/or those at risk of homelessness;
   b. Encourage activities that increase the level of assistance programs to homeless Montanans and/or those at risk of homelessness, with the goal of achieving stable and sustainable housing; and
   c. Encourage the development and rehabilitation of non-rental facilities for the shelter of temporarily homeless Montanans.

Evaluation of past performance

The Montana Departments of Commerce (Commerce) and Public Health and Human Services (DPHHS) have received annual funding for the CDBG, HOME, and ESG programs for over 30 years. Activities have been completed with reduced administrative budgets while adhering to increased regulatory requirements. The decrease in program funding makes it increasingly difficult to address the needs across the state as programs are oversubscribed for funding. Funding through these programs is a key component to organizations struggling to obtain scarce funding to serve households at or below 80% of area median income. As demonstrated in the past performance reports, these programs have been a critical funding source for constructing senior and health facilities in rural areas, homeless facilities that are providing services and support, or providing clean water and sanitary sewer to support the growth of vital, resilient communities across Montana.

Commerce evaluated its past performance in Consolidated Annual Performance and Evaluation Reports (CAPER) for each of the years 2010-2015. These documents state the objectives and outcomes identified in each year's Annual Action Plan, and include an evaluation of past performance through measureable goals and objectives compared to actual performance. These documents can be found on Commerce's website.

Summary of Citizen Participation Process and consultation process

This process provides citizens an opportunity to provide input in the development of the Annual Action Plan and to evaluate and comment on ways to improve the effectiveness of programs. Montana follows the standards set forth in the Citizen Participation Plan (Appendix A of the 2015-2020 Consolidated Plan) during development and adoption of its 2016-2017 Annual Action Plan documents.

The Public Comment period for the Draft 2016-2017 Annual Action Plan is scheduled for March 3, 2016 through April 4, 2016. A public hearing is scheduled for March 25, 2016. This section will be updated once the public comment period has been completed.

Summary of public comments

This section will be completed once the public comment period has been completed.

Summary of comments or views not accepted and the reasons for not accepting them

All comments will be taken into consideration during the development of the 2016-2017 Annual Action Plan.

Summary

This section will be completed once the public comment period has been completed.

PR-05 Lead & Responsible Agencies

Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing and administering the 2015-2020 Consolidated Plan, this 2016-2017 Annual Action Plan, and each grant program and funding source.

Table 1 – Responsible Agencies

Agency Role	Name	Department/Agency
Lead Agency	Meg O'Leary, Director	Montana Department of Commerce
CDBG Administrator	Kelly A. Lynch, Division Administrator	
HOME Administrator		
HOPWA Administrator	Jamie Palagi, Division Administrator	Montana Dept. of Public Health & Human Services
ESG Administrator		

Narrative

Commerce is the lead agency overseeing the administration of the 2015-2020 Consolidated Plan and the preparation of the 2016-2017 Annual Action Plan. Commerce administers CDBG, HOME, and HTF Programs covered by this 2016-2017 Annual Action Plan, and DPHHS administers the ESG Program and Montana's cooperative partnership with North and South Dakota's Housing Opportunities for Persons with AIDS (HOPWA) Program ("Tri-State Housing Environments for Living Positively," or "Tri-State HELP").

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.110, 91.300(b); 91.315(l)

Introduction

The State of Montana engaged in extensive consultation in the preparation of the 2015–2020 Consolidated Plan. The process provided a unifying opportunity for units of local government, the State of Montana, the public, interested organizations, and the private sector to take part in shaping Montana's unique communities, vital public infrastructure, economic competitiveness, housing opportunities, and homelessness programs.

In addition to engaging in the public participation outlined in the Citizen Participation Plan adopted as part of 2015-2020 Consolidated Plan (Appendix A), Commerce and DPHHS continually engage with other state and federal agencies, tribal and local governments, non-profit organizations and the private sector to prioritize annual program needs and goals.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and government health, mental health, and service agencies.

The State of Montana strives to improve the delivery of housing and community development assistance to all Montanans. Commerce and DPHHS specifically support policies and programs that promote decent, safe, affordable housing and community services for the homeless and low-income households such as food banks, mental health centers, senior centers, and other facilities.

Commerce uses a broad-based "team" approach to address affordable housing issues through the Housing Coordinating Team (HCT), coordinated by Commerce. The HCT, facilitates statewide coordination in the delivery of housing services to local housing providers and other organizations. Participating organizations in HCT include Commerce, DPHHS, HUD, U.S. Department of Agriculture, Rural Development (USDA-RD), NeighborWorks, Homeword, Montana Independent Living Project, A.W.A.R.E., Inc., Montana Building Industry Association, nonprofit housing providers, and local housing authorities from across the State.

The Montana Home Choice Coalition (Coalition) is a group of Montana citizens, advocates, providers, federal, state, and local agencies, the housing finance community, realtors, and the home-building industry working together to create better housing choices for Montanans with disabilities. The Coalition, coordinated by A.W.A.R.E., Inc., a private, non-profit corporation, provides quality community-based services to persons with challenging mental, emotional, and, physical needs who might otherwise be served in a more restrictive setting or not at all. The Coalition develops new housing and resources in partnership with other entities, provides education, advocacy and housing counseling, and collects data to support that end. The Coalition is funded and assisted by the DPHHS, A.W.A.R.E., Inc., Fannie Mae, and the Montana Mental Health Association. Both Commerce and DPHHS are members of the Coalition.

The Mental Health Oversight Advisory Council (Council) is a statutory state advisory agency that provides guidance and oversight to DPHHS in the development and management of an effective public health system. The Council's membership includes consumers of mental health services, their immediate family members, advocates for consumers or family members of consumers, the public at large, mental health service providers, legislators, and department representatives. The Council's objective is to create a mental health system that effectively serves families and individuals throughout Montana, including programs for housing, employment, education, and socialization. Both Commerce and DPHHS are members of the Council.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Montana Continuum of Care Coalition (MTCoC) is a diverse statewide collaboration of homeless service providers including nonprofits, faith-based organizations, and local and state governments. The Coalition was established for the purpose of carrying out the duties of the national MTCoC program, as provided for in federal statute 24 CFR Part 578. The MTCoC system is predicated upon community and regionally based continuum of care systems, which form the statewide coalition and continuum of care process. Commerce and DPHHS are involved in MTCoC meetings and committees. The MTCoC coordinator participated in the development, preparation, and review of the 2015–2020 Consolidated Plan.

Funds for transitional housing, permanent supportive housing, and rapid rehousing across Montana are available on a competitive basis through the state's MTCoC process. Twelve regional MTCoC Districts, housed within the state's ten Human Resource Development Councils (HRDCs), serve the entire State of Montana with homeless assistance funds. Each of these regional MTCoC districts provides specific services of crisis stabilization and housing supports for veterans, unaccompanied youth, families with children, and chronically homeless individuals and families. All of Montana's regional MTCoC districts were invited to participate in the development, preparation, and review of the 2015-2020 Consolidated Plan, and serve as repositories for public review of the Draft 2016-2017 Annual Action Plan.

Describe consultation with the Continuum(s) of Care that serves the State in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS.

DPHHS has an invested and integral role with the MTCoC. They coordinate strategy with ESG, participate in regular monthly meetings, and serve as the leading agent for the State's Homeless Management Information System (HMIS). Agencies use HMIS to record homelessness program information including information about clients and households and other types of services. DPHHS workers and its main contractor, Northrup Grumman, maintain the code

tables. It is an evolving system as HUD revises those standards and users find new ways to utilize the data. In this role, DPHHS also provides ongoing training and technical support to users through in-person and online trainings; and a helpdesk with data entry personnel ready to correct data and give direct one-on-one assistance.

Agencies, groups, organizations, and others who participated in the process and consultations

*Additional information will be added once the public comment period has finished.

Table 2 – Agencies, Groups, Organizations Who Participated

#	*Agency/Group/ Organization*	*Type(s)*	*What section of the Plan was addressed by Consultation?*	*Action**
1	Montana Department of Commerce (MDOC)	State	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	Attended planning meetings to develop Plan sections; included on email listserv; participated as public repository; attended public meetings
2	Montana Department of Public Health & Human Services (DPHHS)	State	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Attended planning meetings to develop Plan sections; included on email listserv; participated as public repository; attended public meetings
3	Montana Department of Labor and Industry (DLI)	State	Market Analysis; Economic Development; Anti-Poverty Strategy	Included on email listserv;
4	Montana Department of Revenue (DOR)	State	Housing Needs Assessment; Economic Development; Market Analysis	Included on email listserv;
5	Montana Department of Environmental Quality (DEQ)	State	Lead-Based Paint Strategy; Other – Infrastructure	Included on email listserv;
6	Montana Board of Housing (MBOH)	State	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv;
7	Montana Department of Natural Resources and Conservation	State	Economic Development; Other – Infrastructure	Included on email listserv;
8	Montana Department of Transportation	State	Non-Homeless Special Needs; Economic Development; Other – Infrastructure	Included on email listserv;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
9	Montana State University – Local Government Center	State	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Anti-Poverty Strategy; Other – Infrastructure	Included on email listserv;
10	USDA – Rural Development, Montana Field Office	Federal	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; Market Analysis; Economic Development; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
11	USDOI – Bureau of Indian Affairs, Indian Health Services	Federal	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other-Infrastructure	Included on email listserv;
12	City of Billings	Local	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
13	Butte-Silver Bow Consolidated City-County	County Local	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
14	Town of Ekalaka	Local	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
15	City of Great Falls	Local	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
16	City of Kalispell	Local	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
17	City of Livingston	Local	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
18	City of Missoula	Local	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
19	Madison County	County Local	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
20	A.W.A.R.E., Inc. and the Montana Home Choice Coalition	Regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv;
21	Montana Continuum of Care Coalition	Regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv;
22	Montana Reentry Initiative Task Force	Statewide multi-agency task force	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; Non-Homeless Special Needs; Market Analysis; Anti-Poverty Strategy	Included on email listserv;
23	Living Independently for Today and Tomorrow (LIFTT)	Regional organization Services – Persons with Disabilities	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv; participated as public repository;
24	Montana Independent Living Project (MILP)	Regional organization Services – Persons with Disabilities	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv; participated as public repository;
25	North Central Independent Living Services	Regional organization Services – Persons with Disabilities	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv; participated as public repository;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
26	Summit Independent Living Center	Regional organization Services – Persons with Disabilities	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv;
27	Midwest Assistance Program	Regional organization	Market Analysis; Economic Development; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
28	Rural Community Assistance Corporation	Regional organization	Market Analysis; Economic Development; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
29	Beartooth Resource Conservation and Development Area, Inc.	Regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
30	Big Sky Economic Development Authority	Regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
31	Eastern Plains Economic Development Corporation	Regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
32	Great Northern Development Corporation	Regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv; participated as public repository;
33	Lake County Community Development Corp.	Regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
34	Montana Business Assistance Connection	Regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
35	Ravalli County Economic Development Corporation	Regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
36	Richland Economic Development Corporation	Regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
37	Southeastern Montana Development Corporation	Regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
38	Sweetgrass Development	Regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
39	Communities for Veterans	Regional Organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
40	NeighborWorks Montana	Regional Organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv; participated as public repository;
41	Homeword	Regional Organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv; participated as public repository;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
42	Local Initiatives Support Corporation (LISC)	Regional Organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other - Infrastructure	Included on email listserv;
43	Human Resource Development Council (HRDC) District IX	Regional organization ; Services – Elderly Persons; Services - Children	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv; participated as public repository;
44	Community Action Partnership of Northwest Montana (HRDC District X)	Regional organization ; Services – Elderly Persons; Services - Children	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv; participated as public repository;
45	District XI Human Resource Council	Regional organization ; Services – Elderly Persons; Services - Children	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv; participated as public repository;
46	Butte Public Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
47	Great Falls Public Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
48	Miles City Public Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
49	Missoula Public Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
50	Northern Cheyenne Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
51	Salish & Kootenai Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv;
52	The Center for Children and Families	Services – Children, Persons with Disabilities, Victims of Domestic Violence, Education, Victims; Child Welfare Agency	Housing Needs Assessment; Homeless Needs – Families with Children; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; Market Analysis; Anti-Poverty Strategy	Included on email listserv;
53	Habitat for Humanity of Gallatin Valley	Services - Housing	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv;
54	Haven	Services – Victims of Domestic Violence	Housing Needs Assessment; Homeless Needs – Families with Children; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; Market Analysis; Anti-Poverty Strategy	Included on email listserv;
55	Livingston Food Pantry	Other – Food Bank	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Anti-Poverty Strategy	Included on email listserv;
56	Western Montana Mental Health Center	Regional organization	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Anti-Poverty Strategy	Included on email listserv;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
57	Open Aid Alliance & Yellowstone AIDS Project	Regional organization	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Anti-Poverty Strategy	Included on email listserv;
58	Hot Springs Community Association	Civic leader	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; Anti-Poverty Strategy; Market Analysis; Economic Development; Other - Infrastructure	Included on email listserv;
59	CTA Architects & Engineers	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other - Infrastructure	Included on email listserv;
60	Ecolibrium	Business leaders	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Other - Infrastructure	Included on email listserv;
61	Great West Engineering	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other - Infrastructure	Included on email listserv;
62	Housing Solutions, LLC	Business leaders	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy	Included on email listserv;
63	KLJ Engineering	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other - Infrastructure	Included on email listserv;
64	Land Solutions, Inc.	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other - Infrastructure	Included on email listserv;
65	Mountain Plains Equity	Business leaders	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy	Included on email listserv; participated as public repository;
66	Murtagh Municipal Engineering	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other - Infrastructure	Included on email listserv;
67	Stahly Engineering & Associates	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other - Infrastructure	Included on email listserv;
68	State Bank of Townsend	Business leaders	Housing Needs Assessment; Market Analysis; Economic Development	Included on email listserv;
69	Summit Housing Group	Business leaders	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy	Included on email listserv;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
70	Tamarack Properties Management Company	Business leaders	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy	Included on email listserv;
71	Triple Divide Consulting	Business leaders	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	Included on email listserv;
72	Windemere Real Estate	Business leaders	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; Market Analysis; Economic Development; Lead-Based Paint Strategy	Included on email listserv;
73	Action for Eastern Montana	Regional Organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	Participated as public repository;
74	District IV Human Resource Development Council	Regional organization ; Services – Elderly Persons; Services - Children	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv; participated as public repository;
75	District VI Human Resource Development Council	Regional organization ; Services – Elderly Persons; Services - Children	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv; participated as public repository;
76	Montana Community Development Corporation	Regional Organization	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	Participated as public repository;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
77	Montana Fair Housing	Regional Organization	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Participated as public repository;
78	Montana Human Rights Bureau	State	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Participated as public repository;
79	Montana State Library	State	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Participated as public repository;
80	Opportunities, Inc.	Regional Organization	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Participated as public repository;
81	Rocky Mountain Development Council	Regional Organization	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Participated as public repository;
82	District VII HRDC in Billings	Regional Organization ; Services – Elderly Persons; Services - Children	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv;
83	District XII HRDC in Butte	Regional Organization ; Services – Elderly Persons; Services – Children	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
84	Anaconda Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
85	Billings Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
86	Blackfeet Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
87	Chippewa-Cree Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
88	Dawson County Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
89	Fort Belknap Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
90	Fort Peck Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
91	Glasgow Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
92	Helena Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
93	Poplar (City of) Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
94	Richland Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
95	Ronan Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
96	Whitefish Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv;
97	Bear Paw Development Corporation	Regional Organization	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	Included on email listserv;
98	Headwaters RC&D	Regional Organization	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	Included on email listserv;

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
99	Prospera Business Network	Regional Organization	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	Included on email listserv;
100	Snowy Mountain Development Corporation	Regional Organization	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	Included on email listserv;
101	District IX HRDC	Regional Organization ; Services – Elderly Persons; Services - Children	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv; participated as public repository;
102	Montana Association of Counties	Regional Organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	Included on email listserv;
103	Montana League of Cities and Towns	Regional Organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	Included on email listserv;

Identify any Agency Types not consulted and provide rationale for not consulting

Table 2 – Agencies, Groups, Organizations Who Participated lists those agencies, groups, and organizations that the State consulted with and who took a proactive step in participating in the development of the 2015–2020 Consolidated Plan. There were many additional agency types that were provided ongoing information about the preparation and adoption of the 2015-2020 Consolidated Plan, but did not actively participate or provide comments. For a complete list of agencies, groups, and organizations that Commerce contacted, see Appendix G of the 2015-2020 Consolidated Plan.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Table 3. Describe other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan
Main Street Montana Project	Governor of the State of Montana	The 2015-2020 Consolidated Plan, the 2016-2017 Annual Action Plan, and the Governor's business plan for the State of Montana share the same primary goals to provide decent housing, a suitable living environment, and expand economic opportunities in Montana. Both plans seek to protect Montana's quality of life by providing assistance and support to local community growth planning processes, developing housing, public health and safety, and local infrastructure strategies for sustainable growth and development, and assisting local efforts to revitalize historic downtown business districts. Both plans seek to strengthen and promote Montana to recruit businesses and workers by creating a statewide business and employee recruitment and retention strategy focused on Montana's quality of life; preserving Montana's outdoor recreation opportunities and environment; and strengthening public safety and infrastructure across Montana.
State Continuum of Care	DPHHS	The MTCoC provides funding for many of the same activities provided through the HUD-funded programs addressed in the 2015-2020 Consolidated Plan and 2016-2017 Annual Action Plan for homeless individuals and families.
2015-2019 Consolidated Plan	City of Billings	The City of Billings recently adopted its 5-year Consolidated Plan for 2015-2019. The State and the City of Billings continue to share the same primary goals to provide decent housing, a suitable living environment, and expand economic opportunities through the preservation of the existing affordable housing stock, creating new affordable housing opportunities, and expanding housing choice options for existing and potential residents to foster stable, socio-economically diverse neighborhoods.
2014-2018 Consolidated Plan	City of Missoula	The State and the City of Missoula share the same primary goals to provide decent housing, a suitable living environment, and expand economic opportunities through ending homelessness, increasing affordable rental housing and homeownership opportunities, providing public facilities and infrastructure, achieving economic development, encouraging sustainability and decreasing or mitigating environmental hazards in housing and neighborhoods, eliminating barriers to affordable housing, planning to meet future community development needs, and expanding capacity to support community service needs.
2014-2015 Annual Action Plan	City of Great Falls	The State and the City of Great Falls share the same primary goals to provide decent housing, a suitable living environment, and expand economic opportunities through rehabilitating public facilities to meet ADA accessibility standards and increase energy efficiency; building or rehabilitating transitional housing assistance for homeless or special needs persons; providing support to community service agencies; assisting first-time homebuyers with down payment and closing costs; constructing, purchasing, and rehabilitating new and existing affordable homes for ownership and rental; and funding economic development projects that create jobs for persons of low to moderate income. The City of Great Falls is in the process of adopting its 5-year Consolidated Plan for 2016-2020.

AP-12 Participation – 91.115, 91.300(c)

Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

This section will be completed once the public comment period has been completed.

Table 4. Citizen Participation Outreach

Sort	Mode of Outreach	Target of Outreach
1		
	Summary of response/attendance	
	Summary of Comments Received	
	Summary of comments not accepted and reasons	
2		
	Summary of response/attendance	
	Summary of Comments Received	
	Summary of comments not accepted and reasons	
3		
	Summary of response/attendance	
	Summary of Comments Received	
	Summary of comments not accepted and reasons	
4		
	Summary of response/attendance	
	Summary of Comments Received	
	Summary of comments not accepted and reasons	
5		
	Summary of response/attendance	
	Summary of Comments Received	
	Summary of comments not accepted and reasons	

AP-15 Expected Resources – 91.320 (c)(1,2)

Introduction

This section describes the resources expected to be allocated by program type throughout the State of Montana during Plan Year Two (April 1, 2016 – March 31, 2017). The total amount expected for the remaining three years of the Consolidated Plan take into account a five percent decrease in funding per year.

CDBG administration allocations are capped at 20% of the new CDBG allocation in addition to eligible program income received during the project year. HOME and HTF administration allocations are capped at 10% of the annual allocation and eligible program income received following the required affordability period. Revenue received during a project's affordability period is considered recaptured and may not be used for administration.

Expected revenues for the CDBG program include repayments for funding loaned to businesses that create job opportunities for Montanans of low to moderate income. Expected revenues for the HOME program include recaptured and program income funding generated by the First Time Homebuyer Loan program. The State of Montana is unable to predict the amount of program income that will be received in any given plan year because the amount that will be earned in unknown.

To achieve the most effective and efficient use of CDBG funds, the Director of the Department of Commerce may reallocate up to 15% of the total CDBG allocation among Public Facility, Housing and Neighborhood Renewal, or Economic Development grant categories, depending upon the needs in the State during the Plan Year. A reallocation of more than 15% of the total allocation, or the creation or elimination of a grant category, will be considered a substantial amendment to this 2016-2017 Annual Action Plan, and would require further steps as identified within the Citizen Participation Plan section of the 2015-2020 Consolidated Plan. Reallocations may also be made of any remaining balances within a grant category within the last three months of a 15-month obligation deadline in order to meet the HUD Timely Distribution requirement.

The National Housing Trust Fund (HTF) is a potential source of new funding for housing in Montana beginning in 2016. At this time, funding has not been appropriated to provide an allocation for Commerce to administer the funds. However, this 2016-2017 Annual Action Plan includes information regarding the State of Montana's plans for allocation of HTF funds during Plan Year Two. Governor Bullock designated, and HUD has acknowledged, Commerce as the agency to administer HTF funds for the State of Montana.

Table 5. Expected Resource – Priority Table

Program	Source of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of Con Plan	Narrative Description
		Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	Public/Federal	$5,791,383	$50,000	$4,900,000	$10,741,383	$17,374,149	State Allocation; CDBG funds will be matched in some categories by units of local government; state funds will be used in order to meet CDBG Program match requirements.
	Uses of Funds: Planning, Acquisition, Economic Development, Housing, Public Improvements, Public Services, Administration						
HOME	Public/Federal	$3,023,348	$115,000	$2,702,040	$5,840,298	$9,070,044	State Allocation; HOME funds will be matched with additional resources by sub-recipients who receive HOME funds for LIHTC rental housing development; eligible CHDOs and local governments will also provide matching funds within their acquisition, rehabilitation, and resale projects.
	Uses of Funds: Acquisition, Homebuyer Assistance, Rehabilitation, New Housing Development, Administration						
ESG	Public/Federal	$673,738	$0	$0	$673,738	$2,021,214	State Allocation; ESG funds will be matched with additional resources by sub-recipients who receive ESG funds.
	Uses of Funds: Financial Assistance, Overnight Shelter, Rapid re-housing, Rental Assistance Services, Homeless Prevention						
HOPWA	Public/Federal	$0	$0	$0	$0	$0	Montana only receives HOPWA competitive funds
	Uses of funds: Permanent housing facilities, Permanent housing placement, STRMU, Short term or transitional housing facilities, Supportive services, TBRA						
HTF	Public/Federal	$3,000,000	$0	$0	$3,000,000	$9,000,000	State Allocation (anticipated)
	Uses of funds: Acquisition to support Rental Housing, Rehabilitation of Rental Housing, New Rental Housing Development, Administration.						

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The State of Montana will accomplish the goals of the 2015-2020 Consolidated Plan during Plan Year Two by effectively maximizing and utilizing all available funding resources to conduct housing and community development activities that will serve the economically disadvantaged residents of the non-entitlement areas of the state.

The CDBG program requires 50% match for economic development projects. This match can come from a variety of sources, including cash investment, bank loans, state or federal loan programs, or grants. The majority of CDBG-ED grants are at least partially matched with funds from the state Big Sky Economic Development Trust Fund, the federal Economic Development Agency, private bank loans, or owner equity.

The CDBG program requires 25% match for public facility projects. This match is usually provided either by a direct cash contribution or by incurring a loan or issuing bonds to be re-paid through user charges or property tax assessments. Other local match sources include loan or grant funds from other competitive state grant programs, funds expended for predevelopment planning, the recently appraised value of land or materials provided by the applicant, and the value of labor performed by the applicant's employees. The 25% match requirement may be waived if the local government demonstrates financial hardship. The State of Montana provides state general fund match for the administration of the CDBG program.

The HOME program requires 25% match funding for projects. This match is typically obtained through the use of Low Income Housing Tax Credits. Other local match sources include local costs of infrastructure installation to serve HOME-assisted units, proceeds from bond financing, deferred or waived state or local taxes or fees, and the value of donated land. Funds will also be leveraged with resources from the CHDOs, who may be funded with HOME funds through the CHDO set-aside (15%).

ESG funds are frequently matched by sub-recipients who provide rental assistance, transitional housing and/or supportive services through the MTCoC Program. A significant amount of local ESG sub-recipients contribute additional resources such as block grant funds and local philanthropic foundation resources to the homeless programs they operate. ESG grant funds are required to be matched 100% after the first $100,000 of the fiscal year grant. The State recipient must transfer the benefit of this exception to its subrecipients that are least capable of providing the recipient with matching contributions. See 24 CFR §576.201 (Matching requirement) for further details.

No match is required for CDBG housing or neighborhood renewal grants, but the applicants' attempts or inability to leverage other private, local, state, or federal funds is taken into account in ranking a proposed project for CDBG housing or neighborhood renewal grant funding.

No match is required under the Interim Rule for the new HTF program. The State of Montana anticipates that this program will provide a much needed source of leveraging for other funding programs aimed at the preservation and expansion of the rental housing stock in Montana. In administering the HTF program, Commerce will generally follow the competitive processes for other HUD programs that Commerce administers. The HTF application will require a partnership between non-profits and local governments. Once HUD announces the allocation of HTF funds to the State of Montana, Commerce will draft a HTF Allocation Plan for public review and

comment through an amendment to this 2016-2017 Annual Action Plan. However, in the allocation of HTF funds, the State of Montana will:

1. Use the HTF allocation to increase and preserve the supply of rental housing for extremely low- and very low-income families, including homeless families;
2. Establish a competitive process to receive and prioritize project proposals from Community Housing Development Organizations (CHDO) or other non-profits, in partnership with a local government;
3. Prioritize projects that have other federal, state, or local project-based rental assistance; demonstrate long-term affordability periods; meet the priority housing needs of the State as set forth in the 2015-2020 Consolidated Plan (e.g., housing that is located close to transit or within walking distance of employment centers, community services, and educational facilities; contains green building and sustainable development features; and serve special needs populations; and leverage non-federal funding sources;
4. Require successful applicants to certify that housing units assisted with HTF funds will comply with all HTF requirements as set forth in the interim rule;
5. Work closely with grantees to ensure funded projects are completed and occupied within 4 years of award; and
6. Follow all 2015-2020 Consolidated Plan rehabilitation standards.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The State of Montana does not anticipate that any publicly owned land or property will be used to address the needs identified in the 2016-2017 Annual Action Plan. The majority of state-owned land is either maintained as state recreational land or managed so as to obtain the highest financial return possible for the state's K-12 public school system and other beneficiaries, as mandated by Montana statutes. Local entities leveraging CDBG, HOME, or HTF grant funds may use publicly owned land or property to help accomplish a local project on a case-by-case basis, and in most cases such donations or offers will be considered local match resources.

AP-20 Annual Goals and Objectives – 91.320 (c)(3)&(e)

Goals Summary Information

Below is information on the goals for Plan Year Two for each of the 2015-2020 Consolidated Plan Programs.

Table 6 – Goals Summary

#	Goal Name	Years	Category	Area	Needs Addressed	Funding	Goal Outcome Indicator
1	**Preserve and Construct Affordable Housing**	April 1, 2016 to March 31, 2017	Affordable Housing	Statewide	Affordable Housing Preservation and Construction	CDBG: $1,000,000 HOME: $2,221,014 HTF: $2,000,000	Rental units constructed: 20 Household/Housing Units Rental units rehabilitated: 20 Household/Housing Units Homeowner Housing Added: 2 Household/Housing Units Homeowner Housing Rehabilitated: 4 Household/Housing Units Direct Financial Assistance to Homebuyers: 50 Households Assisted
Preserve and Construct Affordable Housing: The State of Montana will use CDBG, HOME, and HTF funds to fund affordable housing activities that primarily benefit low to moderate income persons.							
2	**Plan for Communities**	April 1, 2016 to March 31, 2017	Non-Housing Community Development	Statewide	Community Planning	CDBG: $500,000	These planning funds will be accessible to all local government across Montana to assist all citizens in the local community with planning needs.
Plan for Communities: The State of Montana will use CDBG funds to help communities engage in various types of planning, including comprehensive community development, housing, public infrastructure, stormwater management, bank stabilization, economic development, downtown revitalization, and preliminary project design. A wide variety of activities are funded that primarily serve LMI persons throughout the state.							
3	**Improve and Sustain Public Infrastructure**	April 1, 2016 to March 31, 2017	Non-Housing Community Development	Statewide	Improving and Sustaining Vital Public Infrastructure	CDBG: $2,062,350	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2,500 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 25 Households Assisted
Improve and Sustain Public Infrastructure: The State of Montana will use CDBG funds to improve existing and construct new public water, wastewater, and storm drain infrastructure that primarily serve LMI persons throughout the State.							

4	**Revitalize Local Economies**	April 1, 2016 to March 31, 2017	Non-Housing Community Development	Statewide	Economic Revitalization	CDBG: $1,505,292	Jobs created/retained: 20 Jobs Businesses assisted: 4 Businesses Assisted Public Service activity: 5 Households Assisted Facade treatment/business building rehabilitation: 1 Business Brownfield acres remediated: 1 Acre Remediated
Revitalize Local Economies: The State of Montana will use CDBG funds to create jobs, expand businesses, and revitalize historic downtown business districts. A wide variety of activities are funded that primarily serve LMI persons throughout the state.							
5	**Reduce Homelessness**	April 1, 2016 to March 31, 2017	Homeless	Statewide	Reducing Homelessness	CDBG: $450,0000 HOME: $500,000 ESG: $673,738 HTF: $1,000,000	Tenant-based rental assistance/Rapid Rehousing: 600 Households Assisted Homeless Person Overnight Shelter: 120 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds Added: 5 Beds Homelessness Prevention: 600 Persons Assisted Housing for Homeless added: 20 Household/Housing Units
Reduce Homelessness: The State of Montana will use CDBG, HOME, HTF, and ESG funds to provide permanent housing, shelter, and services for homeless persons and persons at risk of homelessness. Activities may include construction or rehabilitation of housing or shelters, and direct assistance to serve this clientele throughout the state.							

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

HOME funds will be used in the following strategic goals as listed below. HOME will specifically provide funds to assist extremely low-income, low-income, and moderate-income families (as listed in the table below). HOME funds will assist with providing 20 households access to new or rehabilitated rental units, providing 50 households opportunities for homeownership, and assisting 5 households who are homeless or at-risk of homelessness with permanent housing.

AP-25 Allocation Priorities – 91.320(d)

Introduction

The State of Montana will prioritize the award of HOME and HTF funds to eligible applicants that propose to preserve and construct affordable housing and reduce homelessness. The State of Montana will prioritize the award of CDBG funds to eligible applicants that engage in community planning, sustain and improve vital public infrastructure, revitalize local economies, preserve and construct affordable housing, and reduce homelessness. The State of Montana will continue to use ESG funds to reduce homelessness across the State.

Funding Allocation Priorities

Table 8 – Funding Allocation Priorities

	Preserve and Construct Affordable Housing	Plan for Communities	Improve and Sustain Public Infrastructure	Revitalize Local Economies	Reduce Homelessness
CDBG	17.27%	8.63%	35.61%	25.99%	7.77%
HOME	73.46%	0	0	0	16.54%
ESG	0	0	0	0	100%
HOPWA	0	0	0	0	0%
Housing Trust Fund	66.67%	0	0	0	33.33%

Reasons for Allocation Priorities

The State of Montana identified the allocation priorities set forth above for Plan Year Two through the 2015-2020 Consolidated Plan Needs Assessment and Market Analysis, past experience administering the competitive and non-competitive CDBG and HOME grant programs, collaboration with other state agencies and local governments on disaster resiliency priorities in communities with presidentially declared disasters in 2011, 2012, and 2013, and consultation with the state's local government, non-profit, and private sector partners. The allocation priorities also reflect the extent to which eligible entities have other sources of funding available to accomplish each priority.

With respect to the ESG Program, the State of Montana does not currently allocate funds based on priority needs but rather focuses on allocating funds, in consultation with the MTCoC to ensure the provision of ESG services statewide so all homeless and near homeless Montanans have access in or near their communities. Based on planning, ESG funds are allocated to the 10 regional Human Resource Development Councils (HRDCs) in Montana. Funds are distributed based on a formula allocation, reflecting areas of poverty and general population, as set forth in Section 53-10-502, Mont. Code Annotated, pertaining to the federal Community Services Block Grant.

The amount of funds allocated is based on poverty levels and general population in each service area, relative to the poverty and general population of the entire state. All HRDCs submit work plans, budgets, and reports outlining which of the allowable activities will be undertaken.

How will the proposed distribution of funds address the priority needs and specific objectives described in the Consolidated Plan?

The priority needs, and the allocation of funds to address those needs as set forth above, are designed to specifically address the State of Montana's objectives described in this Annual Action Plan.

Support existing Montana communities. Montana will target CDBG, HTF, and HOME funding towards existing communities to increase community revitalization, improve the efficiency of public infrastructure, and safeguard rural landscapes and natural resources through comprehensive planning, rehabilitate existing homes, build social, economic, and environmental resiliency to severe events, and develop and rehabilitate community facilities and services within walkable neighborhoods and/or neighborhoods served by public transportation systems.

Invest in vital public infrastructure. By using CDBG funds for public infrastructure, Montana will encourage appropriate and comprehensive pre-development planning activities for public infrastructure, provide funding opportunities to improve the safety and efficiency of public infrastructure, build social, economic, and environmental resiliency to severe events, safeguard the environment, and maximize existing public infrastructure investments.

Enhance Montana's economic competitiveness. Montana is committed to utilizing employment as the primary strategy for poverty reduction. Montana will use CDBG funds to revitalize local economies, provide reliable and timely access to employment centers, educational opportunities, services and other basic needs by workers, build economic resiliency to severe events, and expand business access to markets, with a particular focus on employment opportunities located within traditional downtown business centers comprising a mix of businesses, housing, and services. Institutions of Higher Education may collaborate with local governments to access CDBG public service funds for workforce training and education courses in order to increase job creation, retention, and advancement opportunities.

Promote equitable, affordable housing in Montana. Montana is committed to being a great place to live, work, and play, and that quality of life starts with equitable access to affordable housing. Montana will use CDBG, HTF, and HOME funding for preserving and constructing affordable housing that increases mobility and lowers the combined cost of housing and transportation, advancing solar and other on-site renewable energy installations aligned with the Federal Renewable Energy Target, building social and economic resiliency to severe events, and increasing homeownership and rental opportunities for eligible Montanans, particularly those with special needs and the elderly.

Reduce homelessness in Montana. Montana and its partners have adopted a strategic plan to end family homelessness by 2016, veteran homelessness by 2019, individual chronic homelessness by 2022, and all homelessness in the State by 2023. Montana will target CDBG, HOME, HTF, and ESG funds to activities that address the housing needs and increase the level of assistance programs to homeless Montanans and/or those at risk of homelessness.

AP-30 Method of Distribution – 91.320(d)&(k)

Introduction

The Methods of Distribution are identified for CDBG, HOME, ESG, and HTF for Plan Year Two. For purposes of providing more detailed information, the IDIS eCon Planning Suite System distribution method table has been supplemented and reformatted in order to provide the public with a clearer picture of the State of Montana's Methods of Distribution for Plan Year Two.

Distribution Methods

CDBG funds will be used for various activities authorized in Section 105(a) of the amended 1974 Housing and Community Development Act that met national CDBG objectives. Projects are funded in order to meet the CDBG National Objective to benefit persons of low-moderate income (LMI) persons.

The State of Montana annually certifies that not less than 70% of the aggregate funds received during a 3-year period (as identified to HUD) shall be used for activities benefitting persons of LMI. CDBG funds are distributed throughout the state's non-entitlement areas (outside Billings, Great Falls, and Missoula) and targeted for activities that serve persons of LMI. Projects funded with CDBG resources typically provide a community-wide benefit.

Funds are reserved in each category based on a percent of the total funds available for distribution to local governments. The State is allowed $100,000 plus 3% of the State grant for administration and technical assistance in accordance with HUD regulations. The State is allowed 3% of the program income received by units of general local government (whether retained by the unit of general local government or paid to the State) and funds reallocated by HUD to the State.

To achieve the most effective and efficient use of CDBG funds, Director of the Department of Commerce may reallocate up to 15% of the total CDBG allocation. To achieve the most effective and efficient use of CDBG funds, Director of the Department of Commerce may reallocate up to 15% of the total CDBG allocation among Public Facility, Housing and Neighborhood Renewal, or Economic Development grant categories, depending upon needs in the State during the Plan Year. A reallocation of more than 15% of the total allocation, or the creation or elimination of a grant category, will be considered a substantial amendment to this 2016-2017 Annual Action Plan, and will require further steps as identified within the Citizen Participation Plan section of the Consolidated Plan. Reallocations may also be made of any remaining balances within a grant category within the last three months of a 15-month obligation deadline in order to meet the HUD Timely Distribution requirement.

State Program Name: CDBG Housing and Neighborhood Renewal

Funding Sources: CDBG

Describe the State Program addressed by the Method of Distribution: Within the Priority Need to Preserve and Construct Affordable Housing, CDBG funds are utilized for the acquisition and new construction of rental or homeownership units, rehabilitation of rental or homeownership units., and down payment and closing cost assistance made available to persons at or below 80% of the Area Median Income.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: Commerce uses the Uniform Application for Montana Housing Loan, Grant & Tax Credit Programs for CDBG Housing and Neighborhood Renewal applications. CDBG Housing and Neighborhood Renewal funds are only available for non-entitlement units of general local government. The CDBG Housing and Neighborhood Renewal ranking criteria are listed below and indicate the maximum score that can be obtained for each:

	Maximum Possible Points
Community Planning	175
Need for Project	175
Project Strategy	150
Community Efforts and Citizen Participation	100
Benefit to Low and Moderate Income Persons	150
Implementation and Management	175
TOTAL MAXIMUM POSSIBLE POINTS	**925**

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only): CDBG Grant Program applications, grant application guidelines, the project grant administration manual, and other relevant information and resources are available on the Commerce website at http://comdev.mt.gov/programs/cdbg.

Describe how resources will be allocated among funding categories: For Plan Year Two, the State of Montana will allocate $450,000 in CDBG funds to Housing and Neighborhood Renewal activities. The Housing and Neighborhood Renewal award amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

Describe threshold factors and grant size limits. Each project funded must meet the CDBG National Objective of benefiting persons of LMI. Up to $450,000 in CDBG funds may be awarded per project for project activity.

Anticipated Outcome Measure: 5 rental or homeowner units will be constructed and 5 rental or homeowner units will be rehabilitated.

State Program Name: CDBG Non-Competitive Housing

Funding Sources: CDBG

Describe the State Program addressed by the Method of Distribution: Within the Priority Need to Preserve and Construct Affordable Housing, CDBG funds are utilized for activities to create or preserve homeownership with a specific focus on solving health and safety issues and ADA improvements for single family units. These activities can include acquisition and/or

rehabilitation housing units made available to persons at or below 80% of the Area Median Income.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: CDBG Non-Competitive funds will only be available for non-entitlement units of general local government who have completed an application in collaboration with a Certified Housing Development Organization. Once approved for funding, the applicant will remain part of the Non-Competitive pool for a period of no-greater than five years to accomplish the goals established in their application and will gain access the $550,000 in funds set-aside for this funding category.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only): CDBG Grant Program applications, grant application guidelines, the project grant administration manual, and other relevant information and resources are available on the Commerce website at http://comdev.mt.gov/programs/cdbg.

Describe how resources will be allocated among funding categories: For Plan Year Two, the State of Montana will allocate approximately $550,000 in CDBG funds to Non-Competitive Housing activities. Funds that are not awarded within the first 12 months of the program year, as established in this 2016-2017 Annual Action Plan, will be made available to the Public Facilities and Housing and Neighborhood Renewal category of funds.

Describe threshold factors and grant size limits. Each project funded must meet the CDBG National Objective of benefiting persons of LMI. Each housing unit must be inspected by an individual with construction repair expertise and a budget for acquisition and/or rehab created based on the inspection report to correct health and safety issues as well as ADA improvements.

Anticipated Outcome Measure: 6 homebuyers will be assisted.

State Program Name: CDBG Public Facilities

Funding Sources: CDBG

Describe the State Program addressed by the Method of Distribution: Within the Priority Needs to Improve and Sustain Public Infrastructure and Reduce Homelessness, CDBG funds are utilized to construct new or rehabilitate existing public infrastructure or community service facilities to benefit geographical areas with a LMI percentage of 51% or higher, or direct benefits to persons of LMI.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: CDBG Public Facility funds are only available for non-entitlement units of general local government. The CDBG Public Facility uses a competitive application process. The ranking criteria are listed below and indicate the maximum score that can be obtained for each:

	Maximum Possible Points
Community Planning	175
Need for Project	175
Project Concept and Technical Design	150
Community Efforts and Citizen Participation	100

Need for Financial Assistance	200
Benefit to Low and Moderate Income Persons	150
Implementation and Management	175
TOTAL MAXIMUM POSSIBLE POINTS	**1,125**

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only): CDBG Grant Program applications, grant application guidelines, the project grant administration manual, and other relevant information and resources are available on the Commerce website at http://comdev.mt.gov/programs/cdbg.

Describe how resources will be allocated among funding categories: For Plan Year Two, the State of Montana will allocate $2,062,350 in CDBG resources to CDBG Public Facilities activities. The Public Facilities allocation amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

Describe threshold factors and grant size limits. Each project funded must meet the CDBG National Objective of benefitting persons of LMI. Up to $450,000 in CDBG funds may be awarded per project for project activity.

Anticipated Outcome Measure: 2,500 LMI persons will be served with new or improved public infrastructure systems; 25 LMI households will be served with access to new or improved community facilities that provide support services to LMI households; and, 10 units of permanent or temporary housing for homeless individuals or youth will be constructed or rehabilitated.

State Program Name: CDBG Economic Development

Funding Sources: CDBG

Describe the State Program addressed by the Method of Distribution: Within the Priority Need to Revitalize Local Economies, CDBG funds are utilized to make loans or grants to businesses for acquisition, construction, installation, or rehabilitation of commercial and industrial buildings, facilities, equipment, working capital, or train employees.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: CDBG Economic Development applications are reviewed and ranked according to the applicant's ability to demonstrate that 51% or more of the jobs created or retained are held by or will be filled by qualified persons with LMI, document an areawide benefit, or exclusively serve a specific limited clientele.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only): CDBG Grant Program applications, grant application guidelines, the project grant administration manual, and other relevant information and resources are available on the Commerce website at http://comdev.mt.gov/programs/cdbg.

Describe how resources will be allocated among funding categories: For Plan Year Two, the State of Montana will allocate $1,505,292 in CDBG resources to CDBG Economic Development activities. The Economic Development allocation amount is based on beneficiary data of the

project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

Describe threshold factors and grant size limits. Each project funded must meet the CDBG National Objective of benefitting persons of LMI. Up to $400,000 in CDBG funds may be awarded per project for project activity.

Anticipated Outcome Measure: 20 jobs will be created or retained; four businesses assisted; five households assisted through public services activities, one façade treatment or business building rehabilitation will be completed; and one acre of brownfields remediated.

State Program Name: CDBG Housing, Public Facilities, and Economic Development Planning Grants

Funding Sources: CDBG

Describe the State Program addressed by the Method of Distribution: Within the Priority Needs to Plan for Communities, CDBG funds are utilized to engage in comprehensive planning, downtown master planning, business development planning, market studies, preliminary architectural reports, asset management, needs analysis, preliminary engineering, and other studies or plans that support the sustainability of local communities, affordable housing, public works investments, vital employment centers, and the environment.

Describe all of the criteria that will be used to select applications and the relative important of these criteria: CDBG Planning applications are accepted on an on-going basis, and are reviewed and ranked according to the extent to which each applicant's proposal addresses the State of Montana's priority needs as set forth in the 2015-2020 Consolidated Plan and this 2016-2017 Annual Action Plan.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only): CDBG Grant Program applications, grant application guidelines, the planning grant administration manual, and other relevant information and resources are available on the Commerce website at http://comdev.mt.gov/programs/cdbg.

Describe how resources will be allocated among funding categories: For Plan Year Two, the State of Montana will allocate $500,000 in CDBG resources to CDBG Planning activities. The Planning allocation amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

Describe threshold factors and grant size limits. Each project funded must meet the CDBG National Objective of benefitting persons of LMI. Up to $50,000 in CDBG funds may be awarded per project for project activity.

Anticipated Outcome Measure: Not applicable.

State Program Name: HOME Single-Family Noncompetitive (Homebuyer Assistance)

Funding Sources: HOME

Describe the State Program addressed by the Method of Distribution: Within the Priority Needs to Preserve and Construct Affordable Housing, HOME funds are provided to local governments that apply for funding with housing partners to provide down payment and closing cost assistance, within the maximum amounts established annually in the HOME Administrative Manual, to low-income homebuyers to help them purchase a home. Assisted homebuyers must complete homebuyer education and counseling, and the purchased home must meet universal physical conditions standards (UPCS). The Purchase price for the property cannot exceed HUD purchase-price limits and strict resale or recapture provisions are placed on the HOME-assisted units for the period of affordability.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: Those applicants that can demonstrate compliance with the HOME regulations and requirements for homebuyer down payment and closing cost assistance are eligible for HOME funds. HOME Program applications, grant application guidelines, the project grant administration manual, and other relevant information and resources are available on the Commerce website at http://comdev.mt.gov/Programs/HOME.

Describe how resources will be allocated among funding categories: For Plan Year Two, the State of Montana will allocate $500,000 in HOME resources to HOME Single-Family Noncompetitive activities. The Single-Family Noncompetitive allocation amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

Describe threshold factors and grant size limits. All funded Single-Family Noncompetitive activities must meet HOME requirements. Up to $30,000 in HOME funds may be awarded per homeowner for down payment and closing cost assistance.

Anticipated Outcome Measure: 50 homebuyers will be assisted with down payment and closing cost assistance.

State Program Name: Competitive HOME Program

Funding Sources: HOME

Describe the State Program addressed by the Method of Distribution: Within the Priority Needs to Preserve and Construct Affordable Housing and Reduce Homelessness, HOME funds can be used to acquire, rehabilitate, or construct affordable rental units, homeownership units, or permanent or temporary housing for homeless individuals or youth. The purchase price for the property cannot exceed HUD purchase-price limits, strict resale and recapture provisions are placed on the HOME-assisted units for the period of affordability, and HUD-established HOME rents are used for each HOME-assisted unit. The Department will set aside a minimum of 15% of HOME funds for units of local government that will apply for funding for activities sponsored, developed, or owned by Community Housing Development Organizations (CHDOs). CHDO-partnered applicants will receive first consideration on eligible projects that meet the criteria of the Competitive HOME Program.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: Competitive HOME applications are ranked according to the applicant's ability

to meet the application criteria and consistency with the goals in the 2015-2020 Consolidated Plan. HOME Program applications, grant application guidelines, the project grant administration manual, and other relevant information and resources are available on the Commerce website at http://housingcdd.mt.gov/hm/default/mcpx.

Describe how resources will be allocated among funding categories: For Plan Year Two, the State of Montana will allocate $2,221,014 in HOME resources to HOME Competitive activities. The Competitive HOME allocation amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

Describe threshold factors and grant size limits. All funded Competitive HOME activities must meet HOME requirements. The amount of grant ceiling will be determined through underwriting criteria and subsidy limit determinations reviewed during the application process. No grant will be awarded that exceeds the HOME maximum subsidy limit as established by HUD.

Anticipated Outcome Measure: 10 rental or homeowner units will be constructed; 10 rental or homeowner units will be rehabilitated; and, 5 units of permanent housing for homeless individuals or youth will be constructed or rehabilitated.

State Program Name: Housing Trust Fund (HTF) Program

Funding Sources: HTF

Describe the State Program addressed by the Method of Distribution: Within the Priority Needs to Preserve and Construct Affordable Housing and Reduce Homelessness, HTF funds will be used to increase and preserve the supply of rental housing for extremely low- and very low-income families, including homeless families. The rental units must not exceed the HOME maximum per-unit subsidy limits and HUD-established rents will be used for each assisted unit.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: The Department will establish a two-round competitive grant process to receive and prioritize project proposals from eligible entities. Those applicants that can demonstrate project compliance during the first round of the application process with projects that are most closely aligned with the HTF regulations and requirements will be eligible to proceed into the second round to be considered eligible for HTF award of funds; applications will be ranked according to the applicant's ability to best meet the intent of the program, demonstrate financial and community support, and further the goals and objectives of the Consolidated Plan. HTF Program applications, grant application guidelines, the project grant administration manual, and other relevant information and resources will be available on the Commerce website at http://comdev.mt.gov. A specific HTF webpage will be created once additional information is available from HUD.

Describe how resources will be allocated among funding categories: For Plan Year Two, the State of Montana will allocate approximately $3,000,000 in HTF resources to competitive HTF Program activities. With $2,000,000 designated for preserving and constructing affordable housing; and $1,000,000 designated for reducing homelessness. The allocation amount is based

on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

Describe threshold factors and grant size limits. All funded Competitive HTF activities must meet HTF requirements, including the HOME program's maximum per-unit development subsidy limit for housing assisted with HTF funds.

Anticipated Outcome Measure: 5 rental or homeowner units will be constructed; 5 rental or homeowner units will be rehabilitated; and, 10 units of permanent housing for homeless individuals or youth will be constructed or rehabilitated.

State Program Name: ESG Program

Funding Source: ESG

Describe the State Program addressed by the Method of Distribution: Within the Priority Needs to Reduce Homelessness, ESG funds will support activities that provide a comprehensive approach to address the needs of people who are homeless or at risk of homelessness in Montana. These activities are intended to: assist in the prevention and alleviation of homelessness; provide temporary and/or permanent housing for persons who are homeless; and to encourage the development of projects that link housing assistance programs with efforts to promote self-sufficiency. The MTCoC system has been development to help ensure that people who are homeless or at risk of homelessness are able to access needed emergency shelter, street outreach, homelessness prevention, and rapid rehousing services statewide.

Describe all of the criteria that will be used to select applications and the relative important of these criteria: Needs assessments and strategic planning are conducted by the HRDCs to ensure the best alignment of resources available with the needs of low-income people within the services area and the agencies' ability to provide specific services and the expected outcomes. Partnerships with other organizations are considered essential to eliminate duplication of services to best meet the needs within the communities. Funding is provided to emergency shelters operating in the various service areas. Reporting of services and outcomes are submitted annual to the National Association of State Community Service Providers (NASCSP) and reported to Congress as part of the Community Service Block Grant (CSBG) Program. The ESG Program Policy Manual is available on the MDPHHS website at http://dphhs.mt.gov/Portals/85/hcsd/documents/ESGPolicyManual.pdf.

Describe how resources will be allocated among funding categories: For Plan Year Two, the State of Montana will allocate amount of $51,358 to Administration, $68,477 to HMIS, and $564,937 to Program specific activities.

Describe threshold factors and grant size limits. Activities and amounts are determined at the local level by each HRDC in accordance with the MTCoC plan.

Anticipated Outcome Measure: 600 households will be served with rapid rehousing; 120 persons will be assisted with overnight shelter; 600 persons assisted with homelessness prevention ; and, 5 beds of overnight/emergency shelter/transitional housing.

Discussion

All methods of distribution for the CDBG, HOME, HTF, and ESG programs are designed to meet specific program requirements, ensure the most effective use of the funds, and attain the State of Montana's goals and objectives as set forth in the Consolidated Plan.

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No.

Available grant amounts

Not applicable.

Acceptance process of applications

Not applicable.

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

No.

State's process and criteria for approving local government's revitalization strategies.

Not applicable.

AP-50 Geographic Distribution – 91.320(f)

Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

As described in the Consolidated Plan, the State of Montana will not target any particular geographic area for special assistance, but will allow any non-entitlement community to apply for CDBG and all communities to apply for HOME and HTF program funding, dependent on eligible activities and programs. Entitlement communities may apply for competitive HOME and HTF funds if the project demonstrates clear segregation between State-assisted units and Entitlement-assisted units. ESG funds are allocated throughout the state. Therefore, the Geographic Distribution table generated by the IDIS system has been left blank.

Rationale for the priorities for allocating investments geographically

Not applicable.

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction

Below is a summary of the Plan Year Two goals for a number of categories that relate to affordable housing. These goals are related only to the federal resources provided through CDBG, HOME, HTF and ESG, and do not include numbers for those persons assisted through other federal or state resources.

Table 13 – One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households to be Supported	
Homeless:	1340
Non-Homeless	40
Special-Needs:	25
Total:	1405

Table 14 – One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through:	
Rental Assistance:	600
The Production of New Units:	2
Rehab of Existing Units:	4
Acquisition of Existing Units:	50
Total:	656

Discussion

As the information above demonstrates, a significant number of households are served annually through the State of Montana's affordable housing programs.

Rental assistance will be completed primarily through ESG resources that include financial assistance including rental application fees, security and utility deposits, last month's rent, utility payments, and moving costs, and, short-term rent assistance.

The production of new units will be completed primarily through CDBG, HOME, and HTF resources in coordination with Low Income Housing Tax Credits and private financing.

Acquisition and rehabilitation of existing units will be completed primarily through the CDBG non-competitive housing program.

AP-60 Public Housing – 24 CFR 91.320(j)

Introduction

The State of Montana Housing Division manages and oversees Tenant-Based Section 8 funds to Public Housing Authorities (PHAs) throughout the state. The State of Montana will continue to work with the PHAs to house Montana's low-income households.

Actions planned during the next year to address the needs to public housing

This 2016-2017 Annual Action Plan is for a State grantee, and therefore no summary information is available on the actions planned for the PHAs in Montana. This information would be obtained by contacting a given PHA within a designated geographic area.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

This Annual Action Plan is for a State grantee, and therefore no summary information is available on the actions planned for multiple PHAs in Montana. This information would be obtained by contacting a given PHA within a designated geographic area.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable.

Discussion

This Annual Action Plan is for a State grantee, and therefore no summary information is available on the actions planned for multiple Public Housing Authorities in Montana. This information would be obtained by contacting a given PHA within a designated geographic area.

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

Homeless and other Special Needs activities will be carried out according to the eligible uses of funds for CDBG, HOME, and HTF as well as through the ESG program. The nature of the homeless individuals and families in Montana vary for many different reasons. It may be due to leaving one's home as a result of domestic violence, lack of medical assistance, or lack of stable employment. Many households experiencing homelessness are doubled up with family or friends or able to find assistance from a faith-based community for a few days. Non-homeless special needs populations in the state include the elderly and frail elderly, persons living with disabilities, persons with alcohol or other drug addiction, victims of domestic violence, and persons and the families of persons living with HIV. These populations are not homeless, but are at the risk of becoming homeless and therefore often require housing and service programs. The needs of the special needs groups are relative to the programs currently provided.

The State of Montana will work to encourage activities that address the housing needs of those at risk of homelessness, encourage activities that increase the level of assistance to programs serving the special needs groups including those at risk of homelessness. This includes supporting activities to reduce homelessness and encouraging the development and rehabilitation of non-rental facilities for the shelter and transition of temporarily homeless Montanans. Additionally, HOME, CDBG and ESG will continue to support efforts by local governments and partner organizations providing HIV services, substance abuse services, disability services, aiding victims of domestic violence, and assisting the disabled.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Montana divides itself into twelve districts to participate annually in the National Point-in-Time Counts of homeless, unduplicated one night estimates of both sheltered and unsheltered homeless populations, occurring during the last week in January of each year. One finding from that survey is that a growing segment of the homeless population is women, children, and families that have experienced life-altering situations, such as job loss, disaster, divorce, or abuse that have driven them into homelessness.

Montana uses the Continuum of Care model that originated with U.S. Department of Housing and Urban Development, with the goal of supporting the transition of homeless individuals into stabilized self-sufficiency in affordable housing. It is important to note that the Montana

Continuum of Care feels that multiplying a single night's data into an annual estimate does not necessarily result in an accurate representation.

Addressing the emergency shelter and transitional housing needs of homeless persons

Montana encourages efforts to provide shelter and other basic needs to people who are currently homeless, and supports these efforts with CDBG Public Facilities funds. In addition, because preventing homelessness is much less costly than addressing the problem after housing has been lost, Montana also supports efforts that will help people in crisis who are at risk of losing existing housing (homeless prevention) and place homeless people into permanent and affordable housing accompanied by intensive services that will aid them in establishing long-term stability (rapid re-housing).

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experienced homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

As indicated in the Needs Assessment and Market Analysis, the longer one is homeless, the more difficult and costly it is to stabilize and re-house that person. During Plan Year Two, the State of Montana will seek to accomplish the following targets for reducing homelessness:

STRATEGIES	**1. Reallocation of TH to RR or Permanent Supportive Housing (PSH)**		**2. ESG Rapid Rehousing (Family Only)**		**3. TANF Short-term Rent Assistance**		**4. Prioritize Section 8 Vouchers for PSH Graduates**		**5. Decrease LoS – Increase Turnover PSH to Affordable Housing**		**6. 50 Montana State-Funded Vouchers**		**Total New Beds**	**Total Number Households Served**
	Per Year	Total	Per Year	Total	Per Year	Total	Per Year	Total	Per Year	Total	Per Year	Total		
2015	10	10	30	30	10	10	10	10	5	5	20	20	85	27
2016	10	20	15	45	20	30	15	25	5	10	20	40	85	27
2017	10	30	15	60	20	50	15	40	5	15	20	60	85	27
Cumulative Total Beds	30		60		50		40		15		60		255	81

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

DPHHS works with the MTCoC to leverage resources and provide increased and coordinated services to homeless across the state. DPHHS aligns its strategy for reducing and ending

homelessness with the CoCs. DPHHS and subgrantees of ESG funding participate in MTCoC strategic planning discussions and attend working meetings.

The MTCoC prioritizes and ranks homeless projects each year and prepares a consolidated, statewide continuum of care application in response to the Notice of Funding Availability (NOFA). Projects originate from local community continuums of care or a state agency. Project approvals are based upon performance and capacity criteria as well as local needs and HUD priorities.

ESG funds are used to meet the needs of the homeless and 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; referral to mainstream resources; assistance to shelters for victims of domestic and sexual violence, youth homes, and food banks. All HRDCs submit work plans, budgets, and reports outlining which of the allowable activities will be undertaken. In Plan Year Two, HTF funds will support these activities by increasing and preserving the supply of rental housing for extremely low- and very low-income families, including homeless families.

AP-70 HOPWA Goal – 91.320(k)(4)

Not applicable.

AP-75 Action Plan Barriers to Affordable Housing – 91.320(i)

Introduction

Several barriers to affordable housing development and maintaining residency in housing were identified in the Needs Assessment, Market Analysis, and draft *Analysis of Impediments to Fair Housing Choice in Montana (AI)* of the *Draft 2015-2020 Montana Consolidated Plan for Housing and Community Development*, including:

- Rental unit owners or managers refusing to rent to prospective tenants based on their status in a protected class, particularly disability, race, and familial status;
- Negative patterns of lending and investment, particularly with respect to denial of loans and predatory loan terms for American Indian residents, Hispanic residents, and women;
- Lack of knowledge or understanding regarding fair housing laws or housing opportunities;
- Inadequate access to public transportation;
- Insufficient monitoring, oversight, or enforcement of fair housing laws; and
- Lack of local capacity to plan, obtain funding for, administer, and complete affordable housing projects.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Due in part to its rural nature, Montana's non-entitlement communities tend to have limited regulatory barriers to the development of new housing. Instead, barriers to affordable housing in Montana are generally a result of a lack of training, education, and outreach on fair housing rights.

Action 1: The State of Montana will engage partnerships that support and enhance outreach to and education of landlords and property management companies about fair housing rights.

Action 2: The State of Montana will support efforts to conduct audit tests on rental units.

Action 3: The State of Montana will ensure fair housing training is provided at the annual Montana Housing Conference and other local, regional, and statewide conference and education events, and will broadcast such meetings statewide using internet/online, digital, and phone capabilities.

Action 4: The State of Montana will help distribute fair housing informational flyers or brochures to grantees, applicants, and the general public.

Action 5: The State of Montana will create partnerships that enhance outreach and education for American Indian homebuyers through educational forums, credit counseling, and home purchase training.

Action 6: The State of Montana will continue to engage with the network of local fair housing organizations in Montana, and will encourage creation of inclusion of an additional fair housing participant specific to the American Indian population.

Action 7: The State of Montana will consider the extent to which a project addresses an identified barrier to affordable housing in its competitive review and ranking of applications for CDBG, HOME, and HTF grant awards.

Action 8: The State of Montana will provide outreach to and train prospective grantees and units of local government on affirmatively furthering fair housing.

Action 9: The State of Montana will sponsor or co-sponsor events during Fair Housing Month and throughout the year and work to increase awareness of fair housing rights.

Action 10: The State of Montana will help create model "best practice" fair housing practices for distribution to grantees and units of local government.

Discussion

Through the above identified actions during Plan Year Two, the State of Montana will continue to address barriers to affordable housing. The State of Montana is committed to addressing these barriers throughout the implementation of the 2015-2020 Consolidated Plan and through the recently formed steering committee working on addressing goals and objectives identified in the 2015-2020 Analysis of Impediments.

Recently Commerce and DPHHS staff have engaged a steering committee focused on discussion and implementing actions related to the 2015-2020 Analysis of Impediments. The group has begun discussions regarding involvement from other interested parties to help begin to address the impediments through the established goals and objectives. Additional work will continue through the 2016-2017 Annual Action Plan year to continue to address the impediments and achieve the goals and objectives.

AP-85 Other Actions – 91.320(j)

Introduction

The following are actions planned for Plan Year Two and throughout the course of the Consolidated Plan period (2015-2020).

Actions planned to address obstacles to meeting underserved needs

All of the activities which will be funded under the State of Montana's CDBG, HOME, HTF, and ESG Programs will address obstacles to meeting underserved needs. The State will identify and respond to underserved needs as they arise from self-evaluation and citizen participation. In addition, the State of Montana continually provides technical assistance and planning resources to help communities engage in comprehensive planning, downtown master planning, business development planning, market studies, preliminary architectural reports, asset management, needs analysis, preliminary engineering, and other studies or plans that support the sustainability of local communities, affordable housing, public works investments, vital employment centers, and the environment.

Actions planned to foster and maintain affordable housing

The State of Montana has identified preserving and constructing affordable housing as one of its high priority needs. As set forth in the Consolidated Plan, actions planned to foster and maintain affordable housing include developing additional rental housing; developing additional homeownership units; providing down payment assistance; providing owner-occupied rehabilitation activities; and other housing activities. These actions will be funded through the HOME, CDBG, and HTF as set forth above.

Actions planned to reduce lead-based paint hazards

The State of Montana will continue to diligently support acquisition and rehabilitation activities in order to ensure that households, particularly those with children, benefitting from federal housing programs are safe from lead-based paint (LBP) hazards and comply with current requirements of Title X of the Residential Lead Based Paint Hazard Reduction Act of 1992. Both Commerce and DPHHS provide education and information on LBP hazards to parents, families, healthcare providers, grant recipients, and contractors. Commerce requires that any contractor or subcontractor engaged in renovation, repair and paint activities that disturb lead-based paint in homes, child and care facilities built before 1978 must be certified and follow specific work practices to prevent lead contamination. In addition to complying with Title X, UPCS inspections will be performed at rental properties assisted with HTF, HOME, Section 8, and other public rental properties throughout the state.

The Community Development and Housing Divisions added HUD's on-line Lead-Based Paint Visual Assessment Training to its employee on-boarding process to ensure that all staff involved in the funding of housing projects through the Department of Commerce are trained in identifying deteriorated paint and increased risk of the presence of LBP hazards.

Actions planned to reduce the number of poverty-level families

The State of Montana, in coordination with non-profit organizations and the private sector, can influence the chances of helping individuals and families in poverty by supporting local and regional efforts to improve family and individual incomes. All of the strategies and priorities identified in the 2015-2020 Consolidated Plan and this 2016-2017 Annual Action Plan target the improvement of economic conditions of Montanans of lower income, from the rehabilitation and construction of affordable housing, homebuyer assistance, and temporary shelter services to investment in compact, walkable development where efficiencies of public infrastructure, community services, and employment center encourage health, vital, and resilient communities.

Actions planned to develop institutional structure

Gaps in the institutional delivery system exist primarily due to finding limitations that are outside the control of the State of Montana. CDBG, HOME, and ESG resources are not adequate to meet the needs of Montanans of low-moderate income, with special needs, or experiencing homelessness. However, the ability to effectively relay information regarding existing grant opportunities and technical assistance from the State of Montana for eligible entities continues to be one of the State's greatest challenges. There are areas of opportunity for increased collaboration vertically and horizontally across and between agencies, organizations, and the private sector to ensure that services are delivered to the greatest number of eligible entities and individuals in the state. During Plan Year Two, the State will actively engage across state agencies and with the public and private sectors in broad discussions and educational opportunities regarding the economic, social, environmental, and health benefits of creating walkable, resilient communities with increased opportunities and access to affordable housing, community services, existing public infrastructure efficiencies, and jobs.

Actions planned to enhance coordination between public and private housing and social service agencies

The State of Montana will continue to coordinate with public and private partners to discuss current projects and methods to coordinate efforts throughout the State, including the following initiatives:

- DPHHS is represented on various social service state advisory groups to ensure housing services are coordinated with social services for needy populations in Montana.
- DPHHS works proactively with its MTCoC partners to ensure that efficient and effective coordination of services exists between affordable housing and social services.
- Commerce will continue to participate in the Montana Reentry Initiative Task Force and the Housing Coordinating Team.

Discussion

Through the above identified actions during Plan Year Two, the State of Montana will continue to address these various issues. The State of Montana is committed to addressing these issues throughout the implementation of the 2015-2020 Consolidated Plan.

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	$50,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	$0
3. The amount of surplus funds from urban renewal settlements	$0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	$0
5. The amount of income from float-funded activities	$0
Total Program Income:	$50,000

Other CDBG Requirements

1. The amount of urgent need activities	$0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income	Minimum 70%

Overall Benefit – A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan	One year period: 70% 2016-2017 AAP is the only year covered in this AAP

HOME Investment Partnership Program (HOME)
Reference 24 CDF 91.320(k)(2)

The jurisdiction must describe activities planned with HOME funds expected to be available during the year. All such activities should be included in the Projects screen. In addition, the following information should be supplied:

1. ***A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:***

The State of Montana, Montana Department of Commerce (Commerce) will not use HOME funds beyond those identified in 24 CFR Section 92.205.

2. ***A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:***

The State will use recapture provisions for the Montana HOME program for all HOME-assisted homebuyer projects. State recipients and sub-recipients are eligible entities (entities) to carryout HOME-assisted homebuyer activities and must use the recapture provisions. The HOME-assisted homebuyer subsidy can be structured through zero-interest or low interest loans, grants, deferred payment loans, or interest rate subsidies.

3. ***A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:***

Recapture Requirements for Homebuyer Assistance
Commerce expects that all homebuyer assistance will include direct assistance to the homebuyer. Therefore, recapture provisions will be used. In the event circumstances arise where there is no direct subsidy to the homebuyer and HOME funds are used for a development subsidy only, the State of Montana will amend its Annual Action Plan to include a resale provision.

Any of the entities who have elected to provide homebuyer assistance under this program are required to specify their recapture provisions as applicable to the period of affordability. Written agreements for homebuyer assistance activities funded by Commerce will include the recapture provisions to ensure the period of affordability, principal residency requirements, and any other recapture terms and conditions.

During grant monitoring of the HOME program entities, the State will review the deed restrictions, trust indenture, covenants running with the land, mortgages, or other similar mechanisms placed on the HOME-assisted property to ensure the provisions being used are in accordance with those stated in the written agreement with the entities.

During the period of affordability, the entities must complete an annual compliance check to ensure that the initial homebuyer still resides in the property as their principal residence. The most current utility statement, proof of paid taxes, or certificate of homeowner's insurance are acceptable documentation.

Noncompliance occurs when the homeowner does not comply with the terms and conditions of the written agreement during the period of affordability, which includes when the homeowner does not occupy the unit as their principal residence, or when the home is voluntarily or involuntarily sold or a transaction changing ownership has occurred without notice and the recapture provisions were not enforced. In the event of noncompliance, the homeowner is subject to repayment of all HOME assistance invested in the housing unit. This is based on the amount of HOME direct subsidy invested in the property (direct subsidy includes any program income or direct HOME funds invested). The repayment amount is not subject to any reductions that might be otherwise apply under the recapture provisions listed in this document.

Required Recapture Provisions

During the period of affordability, Commerce must be notified of a voluntary or involuntary sale or transaction changing ownership, and the applicable recapture provisions must be carried out. Recapture provisions must ensure that the PJ or entity recoups all or a portion of the HOME assistance to the homebuyers when a voluntary or involuntary sale or transaction changing ownership occurs during the period of affordability (see Period of Affordability Table). The HOME investment subject to recapture is based on the amount of HOME assistance that enabled the homebuyer to buy the dwelling unit. The HOME funds subject to recapture include any direct subsidy and may include down payment assistance, closing costs, the amount reducing the purchase price from fair market value to an affordable price, or any other HOME assistance provided directly to the homebuyer. The recaptured funds must be used to carry out HOME-eligible activities.

The recapture provisions must be established and enforced through a written agreement as well as deed restrictions, trust indenture, covenants running with the land, mortgages, or other similar enforcement mechanisms. Commerce or any entity will specify which enforcement mechanism it will use. In addition, a written agreement with each homebuyer will be executed and will specify the affordability requirements to enable Commerce to retain the authority to enforce them.

Principal Residency

The initial buyer must reside in the home as his/her principal residence for the duration of the period of affordability (see Period of Affordability Table).

Triggering Recapture

If an owner voluntarily or involuntarily transfers his or her property (e.g., through sale or foreclosure) during the period of affordability, the recapture provisions will go into effect.

Direct HOME Subsidy/Amount Subject to Recapture
The amount subject to recapture is the direct HOME subsidy. The direct HOME subsidy is the total amount of HOME assistance that enables the buyer to purchase the unit. This amount includes assistance for: down payment assistance, closing costs, the amount reducing the purchase price from fair market value to an affordable price, and any other HOME assistance provided directly to the homebuyer. Commerce has adopted the following provisions for recapture that are outlined in the HOME regulations and in CPD notice 12-003:

• Recapture of the entire direct HOME subsidy; and
• Owner investment is returned first.

Commerce may also adopt recapture provisions that differ from the model provisions in the HOME regulations. The particular recapture provision adopted (whether one of the models or an alternate approach) requires an amendment to the Annual Action Plan and with specific HUD approval.

Commerce or an entity can never recapture more than the amount of available net proceeds upon voluntary or involuntary sale or transaction changing ownership, unless noncompliance has occurred. Net proceeds is defined as the sale price of the home minus the superior loan repayment (not including HOME loans) and any closing costs. If the amount to be recaptured is more than the net proceeds (i.e., foreclosure or declining housing markets) the seller would be required to repay the balance of the net proceeds, which could be less than the original HOME direct subsidy.

Recapture of the Entire Direct HOME Subsidy
The following are the conditions under which Commerce will enforce the use of recapture of the Entire Direct HOME Subsidy as a recapture provision. In this recapture provision, Commerce or the entity recaptures the entire amount of HOME subsidy provided to the homebuyer before the household receives proceeds from the sale of the property. This recapture is limited to the net proceeds available from the voluntary or involuntary sale or transaction changing ownership during the period of affordability.
This recapture provision will be enforced in the event of a voluntary or involuntary sale or transaction changing ownership that occurs during the period of affordability years zero through 9, as applicable to the Period of Affordability Table. Enforcement of the recapture provision that occurs during the period of affordability year 10 through year 15 (see Period of Affordability Table) will follow the recapture provision: Owner Investment is Returned First. If the period of affordability is less than 10 years, recapture of the entire direct HOME subsidy will only be used, no other recapture provision will be permitted. This will be enforced through the written agreement with the household.

As an example, if the assisted unit received $12,000 in HOME assistance and the unit is voluntarily or involuntarily sold or a transaction changing ownership has occurred during year 4, the entire direct HOME subsidy ($12,000) would need to be repaid according to the net proceeds calculation. If the assisted unit received $42,000 in HOME assistance and the unit is

voluntarily or involuntarily sold or a transaction changing ownership has occurred during year 11, the Entire Direct Subsidy recapture provision would not be triggered, rather the Owner Investment Returned First recapture provision would be triggered.

Owner Investment Returned First
The following are the conditions under which Commerce will enforce the use of Owner Investment Returned First as a recapture provision. In this recapture provision, Commerce or the entity recaptures all or a portion of the HOME subsidy provided to the homebuyer, but allows the homebuyer to recover their entire investment (downpayment and capital improvements made by the owner since the purchase) before recapturing the HOME investment. This recapture includes the net proceeds available from the voluntary or involuntary sale or transaction changing ownership during the period of affordability. However, if net proceeds are insufficient, the homebuyer may not receive their entire investment back, and Commerce or the entity may not be able to recapture the full amount due from the net proceeds available.

Eligible capital improvements include permanent property improvements that improve or enhance the basic livability or utility of the property, but are not normal or recurring maintenance items. The value of capital improvements will be based on the actual costs of the improvements as documented by the homeowner's receipts.

This recapture provision will be enforced in the event of a voluntary or involuntary sale or transaction changing ownership that occurs during the period of affordability years 10 through the minimum years (see Period of Affordability Table) to include owner investment returned first. This will enforced through the written agreement with the household.

As an example, if the assisted unit received $40,000 and the unit is voluntarily or involuntarily sold or a transaction changing ownership has occurred during year 10, the homebuyer's investment would be calculated based on the documented capital improvements made during the period of affordability and any investment made during the original sale. This amount would be deducted from the amount to be repaid according to the net proceeds calculation that would be paid to homeowner and Commerce or the entity.

Period of Affordability
The recapture provisions are in effect for a period of affordability. This period is based on the amount of direct HOME subsidy to the buyer, as follows:

HOME Assistance to Buyer	Period of Affordability
Less than $15,000	5 years
$15,000 - $40,000	10 years
More than $40,000	15 years
Newly constructed rental	20 years

4. ***Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:***

Not applicable.

Emergency Solutions Grant (ESG)
Reference 24 CFR 91.320(k)(3)

1. ***Include written standards for providing ESG assistance (may include as attachment)***

The Emergency Solutions Grant (ESG) is administered by the Montana Department of Public Health and Human Services (DPHHS) Intergovernmental Human Services Bureau (IHSB) as part of the community's larger plan for ending homelessness in Montana.

Montana's ten (10) regional Human Resource Development Councils receive 87.5% of the grant funds. DPHHS retains 2.5% for administrative costs, and 10% supports the Homeless Management Information System (HMIS) upgrade requirements.

Overarching Goals and targeting include:

1. Addressing the housing needs of families and individuals at risk of homelessness or facing the possibility of homelessness (Homeless Prevention);
2. Increasing the level of assistance programs to families and individuals who are homeless so that they may achieve stable and sustainable housing (Rapid Rehousing); and
3. Providing case management and referral services to families and individuals so they have access to supportive stabilization systems.

ESG funds are used to meet the needs of the homeless or those at risk of homelessness at the local level. Program components include Homeless Prevention, Rapid Rehousing, HMIS, and limited Emergency Shelter assistance. Eligible activities include rental assistance, financial assistance for rental application fees, security and utility deposit payments, case management, housing search, support for toll-free telephone referral hotlines for victims and survivors of domestic abuse and other homeless individuals and families, referrals to mainstream resources, essential services and shelter maintenance assistance to shelters for the homeless and victims of domestic and sexual violence, youth homes, and food banks. All HRDCs submit work plans based on local need and priorities, budgets, and reports outlining which of the allowable activities will be undertaken.

DPHHS works with the Montana CoC to leverage resources and provide increased and coordinated services to homeless across the state. DPHHS aligns its strategy for reducing and ending homelessness with the CoCs. DPHHS and subgrantees of ESG funding participate in CoC strategic planning discussions and attend working meetings. The Montana CoC prioritizes and ranks homeless projects each year and prepares a consolidated, statewide continuum of care

application in response to the Notice of Funding Availability (NOFA). Projects originate from local community continuums of care or a state agency. Project approvals are based upon performance and capacity criteria as well as local needs and HUD priorities.

In this way, the ESG program requirements are aligned with other formula programs and rental assistance programs in order to increase efficiency and coordination among the different programs. This framework will maximize community-wide planning and strategic use of resources to:

- Standardize eligibility determinations;
- Prevent and end homelessness through direct funding of the most critical services to help people achieve long-term housing stability and avoid becoming homeless again;
- Improve coordination and integration with mainstream services and focus on shortening periods of homelessness;
- Improve coordination within each community's homeless services including services funded by other programs targeted to homeless people;
- Improve targeting of those most in need;
- Improve data collection and performance measurement;
- Allow each community to tailor its program to the particular strengths and challenges within the community; and
- Marshal available resources capitalizing on existing strength and increase efficiency.

The specific standards and eligibility guidelines by which subgrantees implement the ESG program are set forth in Montana's ESG Policy Manual.

The ESG Program Policy Manual is available on the MDPHHS website at: http://dphhs.mt.gov/Portals/85/hcsd/documents/ESGPolicyManual.pdf.

2. ***If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system***

As a statewide continuum of care, the Montana CoC decided that coordinated entry must be established at the community level and adopted statewide standards to accommodate local flexibility and implementation. The CoC has been working with the HUD Technical Assistance provider, Abt Associates, to implement local coordinated entry systems statewide. The state standards establish criteria for "Standardized Access," "Standardized Assessment," and "Coordinated Referral." Currently, two cities have fully implemented systems (Missoula and Helena) with one using the 211 system of access and other using the Multi-Site Coordinated access approach. Three others (Kalispell, Bozeman, and Butte) are beginning to implement systems that include a blend of the "No Wrong Door" and the Multi-Site Coordinated access approaches. Billings and Great Falls are the remaining major population centers without a coordinated entry plan in place and additional technical assistance has been arranged for Billings and the MT CoC will begin working with Great Falls to begin planning. These seven communities

will cover the vast majority of homeless populations and homeless services in the state. Once coordinated entry has been established in the major population centers, the MT CoC will begin exploring innovative approaches to establishing coordinated entry to more remote and rural areas of the state. Partnerships with other organizations are essential to eliminate duplication of services to best meet the needs within the communities.

3. ***Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations)***

ESG funds are allocated to the 10 regional HRDCs in Montana. Funds are distributed based on a formula allocation, reflecting areas of poverty and general population, as set forth in Section 53-10-502, Mont. Code Annotated, pertaining to the federal Community Services Block Grant. The amount of funds allocated is based on poverty levels and general population in each service area, relative to the poverty and general population of the entire state. All HRDCs will submit work plans, budgets, and reports outlining which of the allowable activities will be undertaken.

4. ***If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless individuals or formerly individuals in considering policies and funding decisions regarding facilities and services funded under ESG***

Not applicable.

5. ***Describe performance standards for evaluating ESG***

Reporting of services and outcomes are submitted annually to the National Association of State Community Service Providers and reported to Congress as part of the Community Service Block Grant Program. DPHHS provides on-site monitoring of the ESG Program via regularly scheduled monitoring visits by program staff, using a monitoring tool and reviewing a selection of case files. Staff reviews the matching requirements, budget, and performance (both financial and operational) against contracted activities in the approved ESG work plans, and 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.