

Appendix A: Draft 2016-2017 Consolidated Annual Performance & Evaluation Report Public Comments and Agency Responses

The draft of the 2016-2017 Consolidated Annual Performance & Evaluation Report (“Draft CAPER”) was made available on June 12, 2017 for a 15-day public comment period ending June 26, 2017. The State of Montana held a public hearing on the Draft CAPER on June 19, 2017, and recorded a [transcript](#) of all comments received at the hearing. All comments received in writing and at the hearing were considered, and the State of Montana’s responses to each comment are provided below.

Comments Received and Responses Thereto

**North Central Independent Living Services, Inc.
Shyla Patera and Jerry Clark, IL Specialists**

Comment #1:

We, Shyla Patera and Jerry Clark, wish to submit the following comments on the annual Consolidated Action Plan and Evaluation Report (CAPER) for the 2016-2017 year on behalf of North Central Independent Living Services, Inc. We, at NCILS, wish to commend the Board of Housing for much of its work regarding HOME funds, CDBG funds, HOPWA funds, ESG funds and more to assist Montanans with disabilities and others in housing crisis to find more stability in their individual housing situations. However, we feel that more needs to be done regarding physical accessibility, visitability, and universal design both in our rental and homebuyer housing stock. The Montana Board of Housing should undertake an assessment of not only its physical housing stock, but also the programs, policies, and partnerships it is forming to ensure that all are accessible and being utilized by those with disabilities that may need the programs most. Montana shelters should be accessible to all including those with mobility, sensory, and chemical disabilities.

We applaud the undertaking of efforts to address coordinated entry for homelessness. However, as federal funds may become extremely narrow in scope over the next years, NCILS encourages innovative practices and policies to ensure that low-income Montanans have access to rental housing. We also would ask that the Board of Housing as well as the State of Montana advocate for those who wish to reintegrate into Montana communities that are coming out of institutional settings, i.e. Montana Developmental Center, Warm Springs, correctional, and other nursing home settings have appropriate DPHHS and housing supports available in order to facilitate successful community transitions and meet Montana’s instead priorities. To meet this goal, we are advocating for both state wide and local housing navigator to be hired on staff when possible. Given potential funding constraints, we encourage public private partnerships and training to meet this goal.

Given the potential impacts of potential funding losses in future federal budgets, Montana and other states should begin building educational coalitions to ensure that Montanans understand the economic impacts that housing plays in our communities.

Response to Comment #1:

The Montana Department of Commerce’s Community Development Division administers the HOME Investment Partnerships (HOME), Community Development Block Grant (CDBG), and Housing Trust Fund (HTF) programs; the Department of Public Health and Human Services administers the Emergency Solutions Grant (ESG) and Housing Opportunities for Persons With AIDS (HOPWA) programs and establishes guidelines as to how these programs can assist all eligible households with improved access. Commerce and DPHHS will continue to support the inclusion of accessibility and visit-ability in proposed projects to the greatest extent possible. During our development of the Annual Action Plan, we will work together to further identify areas where accessibility and visit-ability can be implemented.

Additionally, Commerce and DPHHS will continue to work together to increase the public and private partnerships through the Consolidated Plan processes to ensure that opportunities for improved program delivery can address any potential funding or regulatory changes. Commerce and DPHHS continue this coordination through the collaborative work on the Analysis of Impediments to Fair Housing Choice.