

Appendix A: Draft 2017-2018 Consolidated Annual Performance & Evaluation Report Public Comments and Agency Responses

The draft of the 2017-2018 Consolidated Annual Performance & Evaluation Report (“Draft CAPER”) was made available on June 14, 2018 for a 15-day public comment period ending June 28, 2018. The State of Montana held a public hearing on the Draft CAPER on June 22, 2018 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, IL Specialist**

Comment #1:

I, Shyla Patera, wish to submit the following comments on the annual Consolidated Action Plan and Evaluation Report (CAPER) for the 2017-2018 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, visit ability, 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 and transitional housing facilities should be ADA accessible to all including those with mobility, sensory, and chemical disabilities. We also support expanding funding for 811 programs and mainstream housing vouchers that all Montanans with disabilities can and should be able to access in collaboration with DPHHS.

NCILS encourages the state to explore every opportunity that may homeowner and renters stay in our communities. We would hope that tenant based rental assistance becomes available in more programs than HOPWA. NCILS hopes that Montana will work with out Congressional delegation to ensure that HOME funds and polies that encourage homebuyer financing and construction as well as rent equity and fairness remain in place.

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, Montana 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. the 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 Olmstead priorities. To meet this goal, we are advocating for both state wide and local housing navigators to be hired on Montana Housing and local housing authority staff when possible. NCILS also encourages a housing bridge fund to implemented in Montana. DPHHS and Montana Housing need to follow the housing transitions needs of Montanans with disabilities. NCILS understands that Montanans operates with the Continuum of Care, but we feel that more needs to be done to ensure that MFP and transitions are successful.

For homeowners, we support the MOB home loan program, housing counseling done by Neighbor works, and Montana use of ADA small non competitive funding for health and safety improvement home modifications for residential homes that that are not newly constructed. Montana needs to support policies which support

construction of newly visit able and universally designed constructed homes, but NCILS consumers who live in residential homes are asking our agency about funding for home modifications. NCILS hopes that Montana Housing would investigate home loan income loans or grants for housing repair.

NCILS also supports the effort to report on Montana's Analysis of Fair Housing Impediments. This effort will enhance Montana's ability to address successes and gaps in our housing stock markets and services not only in entitlement communities but rural areas of Montana as well.

On the use of CDBG funds, we need to make our community infrastructure as accessible as possible. Montana communities should adopt ADA transition plans when possible.

As a agency often which serves non-motorized citizens and public transportation riders, NCILS particularly asks that the Montana communities and CDBG applicants focus on ADA curb cuts and ramps, accessible alleyways, as well as making our sidewalks contiguous. The State of Montana needs partnerships between the State MDT and Commerce regarding accessible way finding and signage, sidewalk pavement preservation and more. As a homeowner, I often struggle with rounded curbs when exiting a car or vehicle. I believe that we as a community really need sidewalk pavement preservation and contiguous sidewalks. Thank you for allowing NCILS to submit comments on the CAPER.

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 for how these programs can assist all eligible households with improved access. Comments made regarding programs and funds that are not covered under this Consolidated Annual Performance Evaluation Report will be shared with the Commerce's Housing Division and the Montana Board of Housing staff.

Commerce and DPHHS continue to support the inclusion of accessibility and visit-ability in proposed projects to the greatest extent possible, particularly when funds are used for newly constructed facilities or projects that involve ADA improvements. Commerce and DPHHS ensure ADA requirements are carried out, which includes documenting the completion of ADA self-assessment and transition plan when utilizing CDBG and HOME funds. Facilities including shelters funded through CDBG and HOME are required to be ADA accessible. ESG sub-grantees can choose to use a portion of their ESG allocation to help shelters meet ADA requirements if this is an identified need in their local assessment, however there is a statutory cap on how much can be spent on emergency shelters. Further, shelters are required to meet HUD reporting requirements. Additionally, case managers for both ESG and HOPWA help clients submit requests for reasonable accommodation to private landlords as well as advocate on behalf of their client's needs and help educate private landlords.

Commerce and DPHHS will continue collaborating to increase the public and private partnerships through the Consolidated Plan processes. This includes ensuring opportunities for improved program delivery that 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 and Coordinated Entry to the greatest extent possible.