Governor Steve Bullock

State of Montana
Consolidated Plan
Amendment

MONTANA
DEPARTMENT OF COMMERCE

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Montana Department of Commerce
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DRAFT
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EQUAL HOUSING OPPORTUNITY

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Section I: Executive Summary

ES-05 Executive Summary

Introduction

The Consolidated Plan for Housing and Community Development helps the U.S. Department of Housing and Urban Development (HUD) comprehensively fulfill three basic goals: provide decent housing, provide a suitable living environment, and expand economic opportunities. The consolidated planning process is the framework Montana uses to identify eligible housing and community development priorities consistent with the demonstrated and projected needs of local governments. The State of Montana encourages community and economic development that catalyzes local revitalization to build an economy that provide good jobs and create enduring prosperity and resiliency. These goals are used to assess Montana's affordable housing and community development needs and market conditions, make data-driven, place-based investment decisions, and to measure the impact HUD funds.

The Consolidated Plan is a collaborative process that assists in shaping effective, coordinated neighborhood and community development strategies. The Montana Departments of Commerce (Commerce) and Public Health and Human Services (DPHHS) work collaboratively to allow for strategic planning and citizen participation.

As the lead agency for the Consolidated Plan, Commerce follows HUD's guidelines for citizen and community involvement, and is responsible for overseeing citizen participation requirements that accompany the Consolidated Plan and the Community Development Block Grant (CDBG), HOME Investment Partnerships, and the Emergency Solutions Grant (ESG) programs, as well as those that complement the Commerce planning processes already at work in the state.

Purpose of the Consolidated Plan

The 2015–2020 Montana Consolidated Plan for Housing and Community Development is a comprehensive five- year planning document that identifies how the state will meet its housing, homeless, special needs populations, community development, and economic development needs. As part of this process, Commerce develops the 2015 Montana Annual Action Plan, illustrating how the HUD resources received by the State during the final year of the current 2010-2015 Montana Consolidated Plan will be used. Finally, as part of the development of the 2015– 2020 Montana Consolidated Plan for Housing and Community Development, HUD requires Montana to develop a new Analysis of Impediments to Fair Housing Choice in Montana, which examines barriers to fair housing that exist within the state, including discriminatory actions, omissions, or decisions related to housing; or actions, omission, or decisions that have a discriminatory effect of restricting housing choices for protected classes in Montana.

Introduction pertaining to the Amendment to the 2015-2020 Consolidated Plan

The Montana Department of Commerce has modified the 2015-2020 Montana Consolidated Plan (Plan) and all Annual Action Plans (2015, 2016, 2017, 2018 and 2019) for the 5-year Plan that constitute a substantial amendment to the Plan. The modifications impact several areas of Plan to incorporate the use of all CDBG National Objectives, which include Low and Moderate Income, Urgent Need and Slums and Blight. While all three National Objectives will be incorporated into the Consolidated Plan and accompanying Annual Action Plans, the primary focus is the modifications related to the inclusion of recent changes the state has been experiencing as a result of repercussions of COVID-19. Additional modifications will be made in the accompanying Annual Action Plans to ensure the use and distribution of federal funds, administered by the State, can support communities that are experiencing unexpected and unforeseen needs through all National Objectives. Lastly, to promote the safety and welfare of all participants, the Citizen Participation Plan is also being updated to support use of virtual meetings. Edits to these sections were

-noted for public review through strikethrough (for deleted narrative) and underline (for added narrative) in all documents under this modification and can be found on the Commerce website: https://commerce.mt.gov/conplan. Final documents will remove the strikethrough and underline to submit the substantial amendment for HUD's approval.

Goals of the Consolidated Plan

The goals of the HUD programs administered by the State of Montana are to provide decent housing, a suitable living environment, and expanded economic opportunities for the state's low- and moderate-income residents, particularly those impacted by the repercussions of COVID-19. The State of Montana strives to accomplish these goals by maximizing and effectively utilizing all available funding resources to conduct housing and community development activities that will serve the economically disadvantaged residents of the state. By addressing need and creating opportunity at the individual and neighborhood levels, the State of Montana aims to improve the quality of life for all residents of the state. HUD's

Community and Development Programs help to develop viable communities by funding a number of potential activities within the umbrella of the following three goals:

- *Providing decent housing* by obtaining appropriate housing for homeless persons and assisting those at risk of homelessness; preserving the affordable housing stock; supporting urgent need housing activities that address impacts related to repercussions of COVID-19;~~,~~ increasing the availability of permanent affordable housing, without discrimination; increasing the supply of supportive housing for persons with special needs; and providing affordable housing near job opportunities.
- *Providing suitable living environments* by improving the safety and livability of neighborhoods; improving access to quality facilities, infrastructure, and services; supporting urgent need suitable living environment activities that address impacts related to repercussions of COVID-19;~~,~~ reducing the isolation of income groups within communities through de-concentration of low-income housing; revitalizing deteriorating neighborhoods; restoring and preserving properties of special historic architectural or aesthetic value; and conserving energy resources.
- *Expanding economic opportunities* by creating and retaining jobs; establishing, stabilizing, and expanding small businesses; providing public employment services; encouraging the employment of low-income persons in projects funded under this Plan; supporting urgent need economic opportunity activities that address impacts related to repercussions of COVID-19~~,~~; providing reasonable mortgage financing rates without discrimination; providing access to capital and credit for development activities that promote long-term economic and social viability of the community; and reducing generational poverty of those living in publicly assisted housing by providing empowerment and self-sufficiency opportunities.

The State of Montana will work to integrate efforts in these three areas into broader community development of public and community facilities, economic development, and housing strategies that recognize the limitations in traditional affordable housing initiatives, and look to identify and capitalize on opportunities to innovate through all federally funded programs, and through the use of Urgent Need, Slums and Blight and Low and Moderate Income National Objectives. The State of Montana will seek to identify projects that satisfy criteria developed to help communities improve access to affordable housing and transportation while protecting the environment, and will leverage emerging data and tools that measure the true cost of commuting to residents of affordable housing.

Summary of the Objectives and Outcomes Identified in the Plan Needs Assessment Overview

The following list presents the objectives and outcomes of the *2010-2015 Montana Consolidated Plan for Housing and Community Development*. There may be a need to direct and refine such resources by use of project selection criteria, which may be updated annually, based upon year-to-year need and local circumstances. The objectives and intended outcomes the state will pursue over the next five years are as follows:

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 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

Commerce and 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 measurable 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 plan and to evaluate and comment on the proposed plan to improve the effectiveness of programs. Montana follows the standards set forth in the Citizen Participation Plan (Appendix A) during development and proposal of its Consolidated Plan documents, including the *2015–2020 Montana Consolidated Plan for Housing and Community Development* and the *2015 Montana Annual Action Plan*. To promote the safety and welfare of all interested parties, the state has updated its citizen participation plan to include attendance through virtual meetings, while continuing to provide meaningful public participation. This document has been updated as part of this Consolidated Plan Amendment.

Commerce provided multiple opportunities for the public and stakeholders to comment on the creation and development of the draft *2015–2020 Montana Consolidated Plan for Housing and Community Development* and the *2015 Montana Annual Action Plan*. First, Commerce developed the Fair Housing and Housing and Community Development surveys. (Appendix B.) The surveys were sent to stakeholders and contact lists of approximately 1,300 people in April 2014. Commerce developed a scan code and website for respondents to participate in the online surveys, which were also publicized on flyers and visual boards displayed at various conferences and workshops between May 2014 and October 2014. When the surveys were closed in November 2014, nearly 500 respondents had completed the surveys.

In May 2014, Commerce held four focus group meetings to specifically gain comments from stakeholders with expertise related specifically to affordable housing, economic development, community and public facilities, and impacts related to rapid oil and gas development in Montana. Over 30 experts attended the four focus group meetings either in person or via webinar/conference call. Commerce published an official transcript of each focus group meeting on its Consolidated Plan website. (Appendix C.)

Finally, Commerce held three public input meetings. The first meeting took place on May 22, 2014 at the annual Montana Housing Conference in Miles City. Commerce presented to approximately 70 attendees in addition to webinar/conference call, seeking comments on the creation and development of the draft *2015–2020 Montana Consolidated Plan for Housing and Community Development*. A second meeting was held July 15, 2014 in Kalispell, again seeking comments on the creation and development of the *2015–2020 Montana Consolidated Plan for Housing and Community Development* and the *2015 Montana Annual Action Plan*. Approximately 20 individuals and organizations attended that meeting in person or via webinar/conference call.

On July 16, 2014 in Kalispell, Commerce held a third public meeting to solicit comments for development of the draft *2015-2020 Analysis of Impediments to Fair Housing Choice in Montana*. Approximately 13 individuals and organizations attended that meeting in person or via webinar/conference call.

Full details of the citizen participation process are available on the Commerce website. Commerce published an official transcript of all three public meetings on its Consolidated Plan website to provide access to information regarding the development of these documents. (Appendix D.)

Commerce announced and published the draft *2015–2020 Montana Consolidated Plan for Housing and Community Development* and the *2015 Montana Annual Action Plan* by emailing notices requesting comments from stakeholders to an interested party list of approximately 1,300 people; publishing advertisements in newspapers across Montana, and providing copies of the draft documents for review on its website and at various repositories across the state.

Commerce announced and published the draft *2015–2020 Montana Consolidated Plan for Housing and Community Development Amendment* and the *2015, 2016, 2017, 2018 and 2019 Montana Annual Action Plans Amendments* by emailing notices, requesting comments from stakeholders to an interested party list of approximately 1,300 people; publishing advertisements in newspapers across Montana, sending public announcements and public meeting invitations through email and posting on the Consolidated Plan website, as well as, providing copies of the draft documents for review on its website and at various repositories across the state. Any interested party is encouraged to contact Commerce to request reasonable accommodations to meet the needs of individuals that have Limited English Proficiency or have a disability and wish to participate in the public process.

The public comment period for the Plan and Action Plan Amendments was advertised on March 26, 2020, the public comment period began March 29, 2020, and will end April 28, 2020. A public hearing is scheduled to be held on April 14, 2020, at 11:00 a.m., held as a virtual meeting. The public hearing was announced through the Commerce website, listserv, and multiple newspapers across the state. Once the public comment period ends, a record of the public hearing transcript will be made available through the website below. These comments will be considered, and responses will be provided in Attachment B-1 of the final amendment. See: http://commerce.mt.gov/conplan.

Summary of Public Comments

Both verbal and written comments were received during the development of the draft 2015–2020 Montana Consolidated Plan for Housing and Community Development, the draft 2015 Montana Annual Action Plan, and draft 2015-2020 Analysis of Impediments to Fair Housing Choice in Montana. These comments were considered and incorporated into the draft documents.

A summary of public comments received on the draft 2015–2020 Montana Consolidated Plan for Housing and Community Development, the draft 2015 Montana Annual Action Plan, and draft 2015-2020 Analysis of Impediments to Fair Housing Choice in Montana are included in the final documents submitted to HUD. (Appendix E.) Commerce published an official transcript of the public hearing on its Consolidated Plan website. (Appendix F.)

Commerce will be providing a summary of public comments received on this draft Consolidated Plan Amendment and Annual Action Plans Amendments that will be attached to the final document that is submitted to HUD. These documents will also be made available on the Consolidated Plan website.

Summary of Comments or Views Not Accepted and the Reasons for Not Accepting Them

All comments were taken into consideration during the development of the draft *2015–2020 Montana Consolidated Plan for Housing and Community Development*. A summary of public comments or views received on the draft *2015–2020 Montana Consolidated Plan for Housing and Community Development,* the draft *2015 Montana Annual Action Plan*, and draft *2015-2020 Analysis of Impediments to Fair Housing Choice in Montana* that are not accepted, if any, and the reasons for not accepting them are included in the final documents submitted to HUD. (Appendix E.)

This section will be updated after the draft Consolidated Plan Amendment and Annual Action Plan Amendments have been finalized.

Summary

The 2015–2020 Montana Consolidated Plan for Housing and Community Development functions as:

- A comprehensive five-year planning document outlining the use of HUD funds in the non-entitlement areas of Montana that identifies the state's community revitalization, public infrastructure, economic development, housing, homeless and special population needs, and the respective planned resource investments to satisfy those needs;
- A participatory public process among citizens, organizations, businesses, and other stakeholders;
- An application for federal funds under HUD's formula grant programs;
- A strategy document to be followed in carrying out HUD's programs in Montana; ~~and~~
- A management tool for assessing state performance in carrying out HUD's programs in Montana and tracking results; and~~.~~
- A tool to provide resources and funding to support responses in the event of an emergency or state-wide need.

Section II: The Process

PR-05 Lead & Responsible Agencies

Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

Table 1 – Responsible Agencies

Agency Role	*Name*	*Department/Agency*
Lead Agency	Tara Rice~~Meg O'Leary~~, Director	Montana Department of Commerce
CDBG Administrator	Jennifer Olson, Division Administrator	
HOME Administrator		
ESG Administrator	Jamie Palagi, Division Administrator	Montana Department of Public Health and Human Services
HOPWA Administrator		

Commerce is the lead agency overseeing the development of the *2015–2020 Montana Consolidated Plan for Housing and Community Development*. Commerce administers the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs covered by this Plan, and the Montana Department of Public Health and Human Services (DPHHS) administers the Emergency Solutions Grant (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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PR-10 Consultation

Introduction

The *2015–2020 Montana Consolidated Plan for Housing and Community Development* was developed from the 2014 Plan Year Citizen Participation Plan. This process provides 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. A list of all agencies, individuals, businesses, and organizations Commerce consulted in the development, preparation, and review of the *2015–2020 Montana Consolidated Plan for Housing and Community Development* and *2015-2020 Analysis of Impediments to Fair Housing Choice in Montana* is contained in Appendix G.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental 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 and DPHHS maintain an email list of parties interested in the HUD-funded programs addressed in the *2015–2020 Montana Consolidated Plan for Housing and Community Development*, as well as the planning process (see Appendix G). Regular updates and information about the programs and the development, preparation, and review of the *2015–2020 Montana Consolidated Plan for Housing and Community Development* are sent to this list, especially when soliciting public comment or providing notice of public meetings.

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 Montana Consolidated Plan for Housing and Community Development.*

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 this document, and serve as repositories for public review of the draft Plan.

Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of Homeless Management Information System (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.

Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies, and other entities.

Table 2 – Agencies, groups, organizations who participated

#	*Agency/Group/ Organization*	*Type(s)*	*Consolidated Plan Section(s)*	*How Consulted/Outcomes*
1	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 needs assessment and other Plan sections; participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings
2	Montana Department of Labor and Industry (DLI)	State	Market Analysis; Economic Development; Anti-Poverty Strategy	Included on email listserv; provided economic market data analysis for Plan; received housing and community development needs and fair housing surveys

#	Agency/Group/ Organization	Type(s)	Consolidated Plan Section(s)	How Consulted/Outcomes
3	Montana Department of Revenue (DOR)	State	Housing Needs Assessment; Economic Development; Market Analysis	Included on email listserv; provided economic development and market analysis data for Plan; received housing and community development needs and fair housing surveys
4	Montana Department of Environmental Quality (DEQ)	State	Lead-Based Paint Strategy; Other – Infrastructure	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
5	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	Attended planning meetings to develop needs assessment and other Plan sections; participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings
6	Montana State University – Local Government Center	State	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Anti-Poverty Strategy; Other – Infrastructure	Invited to participate in focus groups; included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings
7	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; received housing and community development needs and fair housing surveys; attended public meetings
8	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; received housing and community development needs and fair housing surveys; attended public meetings
9	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; received housing and community development needs and fair housing surveys; attended public meetings

#	Agency/Group/ Organization	Type(s)	Consolidated Plan Section(s)	How Consulted/Outcomes
10	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
11	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; attended public meetings
12	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; received housing and community development needs and fair housing surveys; attended public meetings
13	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; received housing and community development needs and fair housing surveys; attended public meetings
14	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings

#	Agency/Group/ Organization	Type(s)	Consolidated Plan Section(s)	How Consulted/Outcomes
15	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; received housing and community development needs and fair housing surveys; attended public meetings
16	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
17	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; received housing and community development needs and fair housing surveys; attended public meetings
18	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; received housing and community development needs and fair housing surveys; attended public meetings
19	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; received housing and community development needs and fair housing surveys; attended public meetings

#	Agency/Group/ Organization	Type(s)	Consolidated Plan Section(s)	How Consulted/Outcomes
20	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; attended public meetings
21	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; received housing and community development needs and fair housing surveys; attended public meetings
22	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; received housing and community development needs and fair housing surveys; attended public meetings
23	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; received housing and community development needs and fair housing surveys; attended public meetings
24	Midwest Assistance Program	Regional organization	Market Analysis; Economic Development; Anti-Poverty Strategy; Other - Infrastructure	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
25	Rural Community Assistance Corporation	Regional organization	Market Analysis; Economic Development; Anti-Poverty Strategy; Other - Infrastructure	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys

#	Agency/Group/ Organization	Type(s)	Consolidated Plan Section(s)	How Consulted/Outcomes
26	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
27	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; received housing and community development needs and fair housing surveys; attended public meetings
28	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
29	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
30	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys

#	Agency/Group/ Organization	Type(s)	Consolidated Plan Section(s)	How Consulted/Outcomes
31	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
32	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
33	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings
34	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
35	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys

#	Agency/Group/ Organization	Type(s)	Consolidated Plan Section(s)	How Consulted/Outcomes
36	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; attended public meetings
37	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	Invited to participate in focus groups; included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings
38	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings
39	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; attended public meetings
40	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; received housing and community development needs and fair housing surveys; attended public meetings

#	Agency/Group/ Organization	Type(s)	Consolidated Plan Section(s)	How Consulted/Outcomes
41	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings
42	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	Invited to participate in focus groups; included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings
43	Butte Public Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings
44	Great Falls Public Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings
45	Miles City Public Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings
46	Missoula Public Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv; received housing and community development needs and fair housing surveys; attended public meetings
47	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; received housing and community development needs and fair housing surveys; attended public meetings
48	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; received housing and community development needs and fair housing surveys; attended public meetings

#	Agency/Group/ Organization	Type(s)	Consolidated Plan Section(s)	How Consulted/Outcomes
49	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; attended public meetings
50	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
51	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; attended public meetings
52	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
53	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	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
54	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; received housing and community development needs and fair housing surveys
55	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; attended public meetings

#	Agency/Group/ Organization	Type(s)	Consolidated Plan Section(s)	How Consulted/Outcomes
56	CTA Architects & Engineers	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other - Infrastructure	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
57	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; attended public meetings
58	Great West Engineering	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other - Infrastructure	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
59	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; attended public meetings
60	KLJ Engineering	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other - Infrastructure	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
61	Land Solutions, Inc.	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other - Infrastructure	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
62	Mountain Plains Equity	Business leaders	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
63	Murtagh Municipal Engineering	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other - Infrastructure	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
64	Stahly Engineering & Associates	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other - Infrastructure	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
65	State Bank of Townsend	Business leaders	Housing Needs Assessment; Market Analysis; Economic Development	Included on email listserv; attended public meetings

#	Agency/Group/ Organization	Type(s)	Consolidated Plan Section(s)	How Consulted/Outcomes
66	Summit Housing Group	Business leaders	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy	Participated in focus groups; included on email listserv; received housing and community development needs and fair housing surveys
67	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; attended public meetings
68	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; attended public meetings
69	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; attended public meetings

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 draft *2015–2020 Montana Consolidated Plan for Housing and Community Development*. For a complete list of agencies, groups, and organizations that Commerce contacted regarding the development of the draft Plan, see Appendix G.

Commerce made every effort to be inclusive of all state and local agencies, groups, and organizations in this planning process. In preparing Table 2, Commerce became aware that while DPHHS is a strong state agency partner in the preparation of the Plan, no local health care facilities, local foster care agencies, or local or regional organizations providing resources to persons living with HIV/AIDs had been specifically consulted. Commerce will work to include them in the public review of the draft *2015–2020 Montana Consolidated Plan for Housing and Community Development*.

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

Table 3 - Other Local/Regional/State/Federal Planning Efforts

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 Montana Consolidated Plan for Housing and Community Development 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 this Plan for homeless individuals and families.
2014-2015 Annual Action Plan	City of Billings	The State and the City of Billings share the same primary goals to provide decent housing, a suitable living environment, and expand economic opportunities through the preservation of safe affordable housing, promoting new affordable housing opportunities, increase community participation and collaboration, preserve and increase the housing stock in older neighborhoods, and promote the preservation and revitalization of the community's older 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.

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan.

Commerce worked cooperatively with the DPHHS, DLI, and DOR to develop the *2015–2020 Montana Consolidated Plan for Housing and Community Development*. Commerce reached out to local governments through a variety of outlets, including surveys and focus groups. In particular, Madison County, Butte-Silver Bow Consolidated City-County, Lake County, Ravalli County, and the City of Livingston actively participated in public meetings and focus

groups. In addition, 30 local governments representing a cross-section of rural and urban communities across Montana were contacted by telephone to uncover ordinances or policies that currently may impede fair housing.

The State of Montana works continuously to ensure that its state agencies and local governments across the state are informed about and involved in the implementation of the HUD-funded programs covered by the Consolidated Plan. Recently this collaborative work has resulted in the need to provide modifications to this Consolidated Plan document and Annual Action Plan documents to provide support and resources to communities impacted by the response to COVID-19. Commerce and DPHHS provide trainings, presentations, and workshops to provide information about the HUD-funded programs, including eligibility, available funding, and application guidelines. During 2014, Commerce presented to the Montana Association of Counties, the Montana League of Cities and Towns, the Montana Downtown Association, the Montana Housing Conference, the Montana Rural Water Conference, and the Qualified Allocation Plan workshop. Commerce and DPHHS provide on-going technical assistance to local governments to help communities prioritize local needs, plan for meeting those needs, and successfully obtaining HUD funds and other funding sources for implementing projects. The State of Montana engages in additional public processes to draft and adopt administrative rules governing the application guidelines and administration manuals for the HUD-funded programs covered in this Consolidated Plan.

Efforts to enhance coordination with private industry, businesses, developers, and social service agencies

The State of Montana interacts with other agencies, businesses, developers, social service agencies and other organizations to enhance the coordination of efforts to develop housing, support communities, and generate economic development. Commerce supports a broad-based approach to address affordable housing and community development issues through the Consolidated Plan Steering Committee, Housing Coordinating Team (HCT), the Water, Wastewater and Solid Waste Action Coordinating Team (W2ASACT), and the Montana Economic Developers Association (MEDA). Recently this coordinated work has resulted in the need to provide modifications to this Consolidated Plan document and Annual Action Plan documents to provide support and resources to communities impacted by the response to COVID-19.

Additionally, the Community Technical Assistance Program (CTAP) housed within the Montana Department of Commerce Community Development Division provides direct technical assistance to local governments and elected officials, land use planners, associated professionals and members of the public on issues related to land use planning and development throughout the state. CTAP helps educate constituents on planning best practices, policy and even regulations that promote affordable housing and support resilient community and economic development. Through hands-on training, workshops, webinars, online resources, direct technical assistance by phone or email, and collaboration with local, state and federal agencies, communities learn how to more effectively utilize policy, code & regulations such as zoning, subdivision, building code and tax increment financing tools to help – not hinder – the development of affordable housing alternatives in their jurisdiction. Additionally, the link between affordable housing and transportation alternatives, proximity to jobs, public services and education is also an important focus of the CTAP program. The Montana Main Street Program (another Community Development Division program) further supports these actions by offering additional technical assistance aimed at downtown revitalization through proactive planning and development incentives that support diversity in housing alternatives in Montana's rural communities.

Through these coordinated efforts, private industry, businesses, developers, and social service agencies have both resources available to them and an opportunity to provide input into the Consolidated Plan and the current Amendments to this Plan and Annual Action Plans.

PR-15 Citizen Participation

Summary of citizen participation process/efforts made to broaden citizen participation. Summarize citizen participation and how it impacted goal-setting.

Three key steps were taken to follow Montana's citizen participation process. First, two surveys regarding the identification and prioritization of housing and community development needs and the impediments to fair housing were circulated. Second, four focus groups meetings between experts in housing and community development issues were held. Finally, Montana held a series of public input meetings to provide the public the opportunity to offer input in the development of the *2015–2020 Montana Consolidated Plan for Housing and Community Development and 2015 Annual Action Plan* (Consolidated Plan) documents.

Commerce developed a list of over 1,300 contacts of members of the public; city, town, and county officials; independent and professional consultants; for-profit entities; non-profit entities; state and federal agencies; and, various other organizations that play a role in the development of a comprehensive housing, community, and economic development strategy for Montana. (Appendix G). The stakeholders were notified of all aspects of the development of the Consolidated Plan documents, including links to the surveys, invitations to attend public meetings, and notice of availability of draft documents for review and comment. Webinars and teleconference capabilities were provided during all meetings and hearings; and all meeting materials, minutes, and transcripts were available via the Commerce website.

Commerce developed a scan code and website to participate in the online surveys, which were publicized on flyers and visual boards displayed at conferences and workshops between May 2014 and October 2014. When the surveys were closed in November, nearly 500 respondents had completed the surveys. (Appendix B.)

In May 2014, Commerce also held four focus group meetings to gain input from stakeholders with expertise related specifically to affordable housing, economic development, community and public facilities, and impacts related to rapid oil and gas development in the region. Over 30 experts attended the four focus group meetings. Commerce published an official transcript of all four focus group meetings on its website. (Appendix C.)

Commerce held two public meetings regarding the development of the *2015–2020 Montana Consolidated Plan.* The first public input meeting took place on May 22, 2014 at the annual Montana Housing Conference in Miles City in eastern Montana; and the second public input meeting was held July 15, 2014 in Kalispell in western Montana. Approximately 90 attendees attended the public meetings to provide input.

On July 16, 2014 in Kalispell, Commerce held one public meeting where 13 individuals attended to provide public input to develop the draft *2015-2020 Analysis of Impediments to Fair Housing Choice in Montana*.

Public comments and views submitted during the surveys, public hearings, and comment periods were used in determining the goals and priorities of Consolidated Plan documents.

Full details of the citizen participation process are available on the Commerce website. Commerce published an official transcript of all three public meetings on its Consolidated Plan website to enhance public participation and access to information regarding the development of these documents. (Appendix D.)

Commerce will announce and publish the draft documents by emailing notice to the Consolidated Plan contact list, publishing advertisements in newspapers across Montana, and providing copies of the draft documents for review on the website and at the various repositories across the state.

The public comment period for the Amendment to the *2019–2020 Annual Action Plan* was advertised on March 26, 2020, the public comment period began March 29, 2020, and will end April 28, 2020. A public hearing is scheduled to be held on April 14, 2020, at 11:00 a.m., held as a virtual meeting. The public hearing was announced through the Commerce website, listserv, and multiple newspapers across the state. Once the public comment period ends, a record of the public hearing transcript will be made available through the website below. These comments will be considered, and responses will be provided in Attachment B-1 of the final amendment. See: http://commerce.mt.gov/conplan.

Table 4 – Citizen Participation Outreach

#	*Mode of Outreach*	*Target of Outreach*	*Summary of response/attendance*	*Summary of comments received*	*URL (If applicable)*
Summary of comments not accepted and reasons: No comments were rejected.					
1	Other – Email listserv	All interested citizens	Links to the Housing and Community Development Survey and Fair Housing Survey. A total of 244 responses were received. This list was also contacted and notified regarding all aspects of the development of the Consolidated Plan, including invitations to attend public meetings and notice of availability of draft documents for review and comment.	See Appendix B for tally of survey responses. Comments from the surveys and interested persons on the listserv are integrated throughout this Plan.	http://housingcdd.mt.gov/CP/cpdocuments.mcpx
2	Public Hearing	All interested citizens	Three public meetings were held before plan development; two regarding the Consolidated Plan and one regarding the Analysis of Impediments	See Appendix D for transcripts of the public meetings. Comments from the public meetings are integrated throughout this Plan.	http://housingcdd.mt.gov/CP/cpdocuments.mcpx
3	Public Meeting	All interested citizens	Four focus groups were held to bring in information from housing, community development, and economic development stakeholders throughout the State.	See Appendix C for transcripts of the focus group meetings. Comments from the focus groups are integrated throughout this Plan.	http://housingcdd.mt.gov/CP/cpdocuments.mcpx
4	Internet Outreach	All interested citizens	Throughout the process, documents related to the development of the Consolidated Plan have been and will be posted on the website for public review.	Comments received on documents related to the development of the Consolidated Plan are integrated throughout this Plan.	http://housingcdd.mt.gov/CP/cpdocuments.mcpx
5	Other – Email listserv	All interested citizens	Commerce will announce and publish the draft *2015–2020 Montana Consolidated Plan for Housing and Community Development* and the *2015 Montana Annual Action Plan* by emailing notice to the Consolidated Plan contact list	See Appendix G for a list of all entities that were consulted and encouraged to participate in the Consolidated plan.	

6	Newspaper Ad	All interested citizens	Commerce will announce and publish the draft *2015–2020 Montana Consolidated Plan for Housing and Community Development* and the *2015 Montana Annual Action Plan* by publishing advertisements in newspapers across Montana	N/A	
7	Other-Public Repositories	All interested citizens	Commerce will make copies of the draft *2015–2020 Montana Consolidated Plan for Housing and Community Development* and the *2015 Montana Annual Action Plan* available at over 15 publically accessible locations across Montana	See Appendix A for a list of all public repositories	http://housingcdd.mt.gov/CP/cpdocuments.mcpx

Section III: Needs Assessment

NA-05 Overview

Needs Assessment Overview

Note this section of the Consolidated Plan is not being comprehensively updated with specific details related to economic, social, environmental, and community impacts related to the COVID-19 repercussions. The State of Montana is modifying this Consolidated Plan to broaden the use of CDBG funds through the full use of all National Objectives: Urgent Need, Slums and Blight and Low and Moderate Income. The expansion of the use of CDBG will assist with the known and unknown response to community needs as the COVID-19 repercussions develop over the coming weeks and months. While there is no specific Needs Assessment that has been conducted, on March 13, 2020, Governor Bullock issued an Executive Order declaring a state of emergency to exist within the state of Montana related to the communicable disease COVID-19 novel coronavirus. Since this executive order, Governor Bullock has announced many directives to deploy resources to promote the safety and welfare of all Montanans. These actions identify the current needs of the state and the support needed that can come from the federal resources identified in this Plan Amendment and Annual Action Plan Amendments.

The following narrative describes Montana's socioeconomic characteristics, including population, race and ethnicity, disability, poverty, and unemployment rates with respect to housing needs. Data in this section was gathered from the U.S Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics, and HUD. This information was used to analyze Montana's current social and economic status and determine prospective trends and patterns in growth over the next five years. Tables in this Section were pre-populated with HUD data from the 2007-2011 American Community Survey (ACS), and where indicated, Commerce provided additional data.

Many local, state, and federal agencies are recognizing the role that transportation costs play in calculating the affordability of housing. As former HUD Secretary Shaun Donovan noted, "The costs of transportation now approach or exceed those of housing for many working families, yet federal definitions of housing affordability fail to recognize their interdependence." HUD encourages the coordination of housing, transportation, water, and other infrastructure investments to make neighborhoods more prosperous, allow people to live closer to jobs, save households time and money, and reduce pollution. The Location Affordability Index and other tools help planners, policymakers, and the private sector make decisions about land use, housing, transportation, and economic development by illustrating how housing and transportation costs impact affordability. The State of Montana will use these tools and other data resources to help stakeholders understand, and ultimately reduce, the combined housing and transportation cost burden borne by Montana families.

NA-10 Housing Needs Assessment

Summary of Housing Needs

According to the 2010 Census and 2007-2011 ACS, the State of Montana had a population of 982,854 with 403,495 households. This represents a 9% population increase since the year 2000 Census (Base Year), and a household increase of 12%. The median household income for 2007-2011 according to the ACS is $45,324, a 37% increase over 2000.

The 2010 Census indicates that the State of Montana has 482,825 housing units, with 409,607 occupied and 73,218 vacant. According to the American Community Survey in 2012, Montana's housing stock includes 278,607 owner-

occupied units and 131,189 renter-occupied units. This total housing stock is comprised of 346,912 single-family units and 54,345 mobile home units. The homeownership rate is 68%. The 2014 Rental Vacancy Survey indicates a vacancy rate (statewide) of 3.7 percent. The 2014 Montana Housing Status Survey, also known as the Point-In- Time (PIT) Homeless Survey, showed that 2,328 persons were homeless in Montana in 2014, which includes 392 homeless families with children and 339 chronically homeless persons.

HUD categorizes housing difficulties based on three conditions: 1) overcrowding (more than one person per room), 2) lack of complete plumbing or kitchen facilities, and 3) cost burden greater than 30% (severe cost burden is more than 50%). That status of housing in Montana with respect to each of these issues is shown in the following tables.

Table 5 – Housing Needs Assessment Demographics

Demographics	*Base Year 2000*	*Most Recent Year 2011*	*Percent of Change*
Population	902,195	982,854	9%
Households	359,070	403,495	12%
Median Income	$33,024	$45,324	37%
Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)			

Table 6 – Total Households Table

Household Type	*0-30% HAMFI*	*>30-50% HAMFI*	*>50-80% HAMFI*	*>80-100% HAMFI*	*>100% HAMFI*
Total Households *	44,865	50,760	73,825	45,000	189,045
Small Family Households *	12,115	14,130	24,730	18,115	101,680
Large Family Households *	2,250	2,660	4,765	3,710	13,165
Household contains at least one person 62-74 years of age	7,170	9,905	14,510	8,830	37,355
Household contains at least one person age 75 or older	6,455	10,330	11,495	4,895	12,645
Households with one or more children 6 years old or younger *	7,525	7,405	10,265	7,265	18,270
* the highest income category for these family types is >80% HAMFI					
Data Source: 2007-2011 CHAS *HUD Median Family Income (HAMFI)*					

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

Table 7 – Housing Problems Table

Household Type	*Renter*					*Owner*				
	0-30% AMI	*>30-50% AMI*	*>50-80% AMI*	*>80-100% AMI*	*Total*	*0-30% AMI*	*>30-50% AMI*	*>50-80% AMI*	*>80-100% AMI*	*Total*
Substandard Housing - Lacking complete plumbing or kitchen facilities	1,130	625	565	330	2,650	550	400	275	295	1,520
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	325	310	285	180	1,100	80	90	75	80	325
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	700	535	430	245	1,910	245	265	675	390	1,575
Housing cost burden greater than 50% of income (and none of the above problems)	14,220	5,920	935	110	21,185	9,435	6,305	6,335	1,660	23,735
Housing cost burden greater than 30% of income (and none of the above problems)	3,465	10,345	7,405	1,290	22,505	3,565	5,980	9,750	6,475	25,770
Zero/negative Income (and none of the above problems)	1,685	0	0	0	1,685	1,340	0	0	0	1,340
Data Source: 2007-2011 CHAS										

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

Table 8 – Housing Problems 2

Household Type	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	16,380	7,390	2,215	865	26,850	10,310	7,055	7,365	2,430	27,160
Having none of four housing problems	8,665	17,875	26,625	13,580	66,745	6,490	18,440	37,620	28,125	90,675
Household has negative income, but none of the other housing problems	1,685	0	0	0	1,685	1,340	0	0	0	1,340
Data Source: 2007-2011 CHAS										

3. Cost Burden > 30%

Table 9 – Cost Burden > 30%

Household Type	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	5,845	4,890	3,025	13,760	3,425	4,210	7,045	14,680
Large Related	800	825	305	1,930	690	725	1,260	2,675
Elderly	3,215	3,585	1,425	8,225	5,915	5,085	4,430	15,430
Other	9,190	7,575	3,885	20,650	3,350	2,605	3,515	9,470
Total need by income	19,050	16,875	8,640	44,565	13,380	12,625	16,250	42,255
Data Source: 2007-2011 CHAS								

4. Cost Burden > 50%

Table 10 – Cost Burden > 50%

Household Type	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	4,470	1,420	210	6,100	2,810	2,385	2,695	7,890
Large Related	545	210	10	765	525	390	450	1,365
Elderly	2,270	1,425	420	4,115	3,835	2,060	1,815	7,710
Other	7,860	3,085	410	11,355	2,505	1,565	1,440	5,510
Total need by income	15,145	6,140	1,050	22,335	9,675	6,400	6,400	22,475
Data Source: 2007-2011 CHAS								

5. Crowding (More than one person per room)

Table 11 – Crowding Information – 1/2

Household Type	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	1,045	700	605	310	2,660	255	330	590	370	1,545
Multiple, unrelated family households	24	140	85	14	263	85	34	165	125	409
Other, non-family households	15	100	115	105	335	0	10	0	10	20
Total need by income	1,084	940	805	429	3,258	340	374	755	505	1,974
Data Source: 2007-2011 CHAS										

Table 12 – Crowding Information – 2/2

Criteria	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Data Source: 2007-2011 CHAS								

Describe the number and type of single person households in need of housing assistance.

The 2007-2011 ACS recorded 118,262 single-person households, or 29.3% of households in Montana in 2011. It is unknown the exact distribution of single-person households among all households by cost burden. However, since both the elderly and young adults may represent a proportionally greater number of single person households than other categories of individuals, the percentage of single person households requiring assistance is likely greater than the proportion of these households among total households in the state.

According to the 2014 Montana homeless survey, there were 2,328 homeless persons in Montana in 2014. Of those, there were 392 homeless families with children and 339 individuals classified as chronically homeless. The number of homeless single person households was 1,097 in 2014. So on a yearly basis over 1000 single individuals require housing assistance. These are individuals who sought housing assistance through shelter or other service to the homeless.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Respondents to the 2014 Housing and Community Development Survey indicate a medium to high level of need in Montana for additional services and facilities for both victims of domestic violence and for persons with physical and/or developmental disabilities.

Victims of domestic violence accounted for 6.5 percent of Montana's homeless population in the 2014 Point-in- Time count. During a portion of the public input meetings, the Montana Department of Commerce received additional comments about homelessness and domestic violence:

- 50 percent of cities surveyed cite domestic violence as a primary cause of homelessness (US Conference of Mayors, 2005);
- Approximately 63 percent of all homeless women have experienced domestic violence (National Network to End Domestic Violence); and,
- One in three women will experience domestic or sexual abuse in her lifetime; one in four women will experience severe physical violence (World Health Organization, 2013).[16]

What are the most common housing problems?

According to 2000 Census data, 16.0 percent of households in Montana experienced a cost burden at that time. An additional 10.8 percent of households experienced a severe cost burden. By 2012, 17.3 percent of households were cost-burdened, and the share of households experiencing a severe cost burden had grown to 12.8 percent. In both years, cost burdens fell more heavily on rental tenants than on home owners with a mortgage, although in 2011 homeowners with a mortgage faced cost burden at almost the same rate as renters. Households that rent faced severe cost burden at a much higher rate than homeowners with a mortgage.

Are any populations/household types more affected than others by these problems?

From the above information it appears that the very low income (0-30% AMI) and the elderly renters or homeowners are the main population/household types that are more affected with the typical housing challenges in Montana than the other types. In most of the categories of housing problems, if you add the 0-30% AMI category and 30-50% AMI, well over 50% of the units experiencing housing problems are occupied by a household of these incomes.

For the elderly, this situation is expected to get worse, given that the two fastest growing age groups in Montana are those aged 55 to 64 and those aged 65 and older. This may be a significant issue given this population often has a "fixed" income and cannot seek employment when taxes increase on their properties or the rent is increased above their monthly Social Security checks.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.

Low-income households commonly utilize a higher portion of their income on basic needs. The number of low to moderate income (0-80%AMI) households in Montana paying over 30% of its income just on housing is 84,820 or 21% of all households in the state. HUD considers any amount over 30% a cost burden and this is especially true of households on limited income. For renters, the percentage of households incomes in the 0-30% AMI range and paying more than 50% of their income for rent is 67.8% of all households with a cost burden greater than 50%. This income category of homeowners is also the highest with 9,675 (43%) households paying more than 50% of their income for their mortgage, taxes, and insurance. Households in this situation often struggle financially and are at the greatest risk of facing homelessness. Access to housing for persons who may have records, poor or no credit, and lack employment making it nearly impossible to maintain stable housing.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates

The state of Montana views at-risk, as these categories are defined by HUD and the U.S. Census, persons with a severe housing cost burden, persons living in overcrowding, persons with severe mental illness, persons living with disabilities, persons with alcohol or other drug addiction, victims of domestic violence, and persons living with HIV and their families.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Overcrowding, seen in both renter and homeowner households, is one characteristic linked with instability and an increased risk of homelessness. In 2011, 5,192 households in Montana were overcrowded, including 2,643 owner-occupied households and 2,549 renter-occupied households. Severely overcrowded households comprised 2,211 households in the state including 684 owner-occupied households and 1,527 renter-occupied households. By 2012, the share of overcrowded households had fallen from 2.1 to 1.3 percent since 2000, and the share of severely overcrowded households had fallen from 1.0 to 0.5 percent. In both years, overcrowding and severe overcrowding were more prevalent in renter-occupied housing units than in owner-occupied units.

A second household characteristic linked with instability and an increased risk of homelessness is housing that lacks complete kitchen facilities. A lack of these facilities indicates that the housing unit is likely to be unsuitable. In 2000, approximately 1.1 percent of the housing stock of Montana lacked complete kitchen facilities. This figure represented about 3,775 units. By 2012, the proportion of households that lacked full kitchen facilities had risen to 1.2 percent, rising to 4,676 households. Similar proportions of housing units lack complete plumbing facilities in both years. In 2000, 0.8 percent of housing units had inadequate plumbing facilities. By 2012, this figure had dropped to 0.7 percent.

NA-15 Disproportionately Greater Need: Housing Problems

Introduction

While the Census Bureau does not delve deeply into the physical condition of the housing stock, selected questions from the decennial census and the American Community Survey do indeed address housing difficulties being faced by households.

1. 0%-30% of Area Median Income

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Housing Problems	*Has one or more of four housing problems*	*Has none of the four housing problems*	*Household has no/negative income, but none of the other housing problems*
Jurisdiction as a whole	33,550	8,514	2,840
White	28,079	6,725	2,395
Black / African American	173	34	34
Asian	173	24	88
American Indian, Alaska Native	3,306	1,156	248
Pacific Islander	0	35	0
Hispanic	1,199	313	49

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Data Source: 2007-2011 CHAS			

2. 30%-50% of Area Median Income

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	27,370	20,397	0
White	24,452	17,836	0
Black / African American	152	138	0
Asian	208	113	0
American Indian, Alaska Native	1,407	1,521	0
Pacific Islander	0	0	0
Hispanic	748	408	0
Data Source: 2007-2011 CHAS			

3. 50%-80% of Area Median Income

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	24,327	45,440	0
White	22,515	40,853	0
Black / African American	45	189	0
Asian	135	360	0
American Indian, Alaska Native	705	2,443	0
Pacific Islander	8	0	0
Hispanic	617	1,095	0
Data Source: 2007-2011 CHAS			

4. 80%-100% of Area Median Income

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	9,475	33,601	0
White	8,781	30,939	0
Black / African American	50	48	0
Asian	64	54	0
American Indian, Alaska Native	187	1,524	0
Pacific Islander	19	10	0
Hispanic	264	649	0
Data Source: 2007-2011 CHAS			

Discussion

Another type of housing problem reported in the 2000 Census was cost burden, which occurs when a household has gross housing costs that range from 30 to 49.9 percent of gross household income; severe cost burden occurs

when gross housing costs represent 50 percent or more of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent plus utility charges. One common measure to assess housing affordability is the ratio of owner or renter costs to total household income. Housing is considered to be "affordable" if owner or renter costs (which include mortgage or rental payments, real estate taxes (as applicable), utilities, insurance, and various other fees) are less than 30% of the total household income. Tables in Appendix H show the breakdown within households that report severe cost burden, comparing the AMI with the type of household.

Transportation costs are the second largest budget item for most households, while Montana is perceived as vast and largely rural, higher-density infill housing projects that take advantage of existing buildings, infrastructure and transportation options to recognize the opportunity for mixed-use, flexible-use, and mixed-income projects is an appropriate focus for reducing cost burden. Prioritizing housing options in existing neighborhoods has the additional benefit of decreasing commuting costs and time while increasing walking and cycling options and the health and well-being of residents of the community.

According to 2000 Census data, 16.0 percent of households in Montana experienced a cost burden at that time (see Appendix H). An additional 10.8 percent of households experienced a severe cost burden. By 2012, 17.3 percent of households were cost-burdened, and the share of households experiencing a severe cost burden had grown to 12.8 percent. In both years, cost burdens fell more heavily on rental tenants than on home owners with a mortgage, although in 2011 homeowners with a mortgage faced cost burden at almost the same rate as renters. Households that rent faced severe cost burden at a much higher rate than homeowners with a mortgage. According to the Housing + Transportation Index, the average Montanan is severely cost burdened when transportation costs are taken into account, with an average 56% of household income spent on housing plus transportation costs.

Table H.1 (Appendix H) shows the cost burden by race/ethnicity. The majority of reported households are of 30% or less for housing cost burden. Approximately 16% of the reported households fall between 30-50% of the housing cost burden, and approximately 12% of the reported households fall between the greater than 50% of the housing cost burden. A relatively small percentage, less than 1%, of the reported households have either no or negative income.

A total of 21,450 renter households have a housing cost burden greater than 50% of the household income (see Appendix H). Severely overcrowded renter households have the smallest number of individuals within the rental community. 26,805 owner households have the housing problem of a cost burden greater than 30% of their income. This is the largest housing problem within the homeowner category. The smallest housing problem within the homeowner community is households which are severely overcrowded. Only 275 households are considered severely overcrowded.

NA-20 Disproportionately Greater Need: Severe Housing Problems

Introduction

Severe housing difficulties are represented by three different conditions: more than 1.5 persons per room, lack of complete plumbing or kitchen facilities, and cost burden over 50%. Each of these conditions is addressed on the following pages.

1. 0%-30% of Area Median Income

Table 17 – Severe Housing Problems 0 - 30% AMI

Severe Housing Problems	*Has one or more of four housing problems*	*Has none of the four housing problems*	*Household has no/negative income, but none of the other housing problems*
Jurisdiction as a whole	26,497	15,538	2,840
White	22,047	12,726	2,395
Black / African American	133	74	34
Asian	152	44	88
American Indian, Alaska Native	2,690	1,740	248
Pacific Islander	0	35	0
Hispanic	1,012	504	49
Data Source: 2007-2011 CHAS			

2. 30%-50% of Area Median Income

Table 18 – Severe Housing Problems 30 - 50% AMI

Severe Housing Problems	*Has one or more of four housing problems*	*Has none of the four housing problems*	*Household has no/negative income, but none of the other housing problems*
Jurisdiction as a whole	12,136	35,566	0
White	10,934	31,263	0
Black / African American	33	257	0
Asian	174	147	0
American Indian, Alaska Native	477	2,456	0
Pacific Islander	0	0	0
Hispanic	289	868	0
Data Source: 2007-2011 CHAS			

3. 50%-80% of Area Median Income

Table 19 – Severe Housing Problems 50 - 80% AMI

Severe Housing Problems	*Has one or more of four housing problems*	*Has none of the four housing problems*	*Household has no/negative income, but none of the other housing problems*
Jurisdiction as a whole	8,194	61,549	0
White	7,652	55,733	0
Black / African American	0	234	0
Asian	43	448	0
American Indian, Alaska Native	350	2,787	0
Pacific Islander	4	4	0
Hispanic	104	1,600	0
Data Source: 2007-2011 CHAS			

4. 80%-100% of Area Median Income

Table 20 – Severe Housing Problems 80 - 100% AMI

Severe Housing Problems	*Has one or more of four housing problems*	*Has none of the four housing problems*	*Household has no/negative income, but none of the other housing problems*
Jurisdiction as a whole	2,491	40,581	0
White	2,224	37,479	0
Black / African American	0	98	0
Asian	24	92	0
American Indian, Alaska Native	150	1,561	0
Pacific Islander	15	14	0
Hispanic	53	866	0
Data Source: 2007-2011 CHAS			

Discussion

Similar to the data for housing problems under NA-15, the rate of severe housing problems appear to be slightly greater for the Asian and Pacific Islander populations than the state population as a whole. This is true in all income ranges. These three populations represent a very small percentage of the state population. This may be due in large part to the very small minority populations in the state and the results being “skewed” by the small sample size.

NA-25 Disproportionately Greater Need: Housing Cost Burdens

Introduction

This section assesses whether or not any racial or ethnic group has disproportionately greater need in comparison to state population as a whole.

1. Housing Cost Burden

Table 21 – Greater Need: Housing Cost Burdens AMI

Housing Cost Burden	*<=30%*	*30-50%*	*>50%*	*No / negative income (not computed)*
Jurisdiction as a whole	265,988	58,933	44,865	3,228
White	244,455	53,701	39,639	2,739
Black / African American	678	269	133	34
Asian	1,198	200	350	88
American Indian, Alaska Native	11,754	2,265	2,596	289
Pacific Islander	130	8	4	0
Hispanic	4,661	1,509	1,346	49
Data Source: 2007-2011 CHAS				

Discussion

In the 0-30% range, Pacific Islander households appear to experience a somewhat greater proportion of housing cost burden than the state as a whole. In the other two ranges, the proportions of housing cost burden do not very greatly from the state average. This may be due in large part to the very small minority populations in the state and the results being "skewed" by the small sample size.

NA-30 Disproportionately Greater Need: Discussion

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

There is considerable variability in the percentages of housing problems and cost burden experienced by each population across income categories. This may be due in large part to the very small minority populations in the state and the results being "skewed" by the small sample size.

If they have needs not identified above, what are those needs?

None

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The largest single non-white group in the state is American Indian, Alaskan Native. This population is largely located on the state's seven Indian reservations. In all categories and income ranges, the level of need among American Indian, Alaskan Native households is below the state average.

NA-35 Public Housing

Introduction

Commerce is the statewide public housing authority. In Montana, public housing authorities are setup under state law at the local level to better meet the needs of the local community. The statewide PHA does not own or operate any public housing units, and only administers Section 8 vouchers. However, Commerce is concerned about the number of public housing units and their underlying contracts that are at risk of expiring. If this were to happen it would severely affect the affordable housing stock in the state.

As it is a significant challenge across the whole state is finding units that have rents that are reasonable for voucher holders. With vacancy rates extremely low in all our communities losing any public housing units would be detrimental. Commerce is also concerned about the funding for the voucher programs and how these programs are budgeted. With the stop and go nature of the program over the last couple years and future funding of the program being based on past utilization there is concern of a continual deterioration of funding levels if lease levels fluctuate.

1. Totals in Use

Table 22 - Public Housing by Program Type

Criteria	*Program Type*								
	Certificate	*Mod-Rehab*	*Public Housing*	*Vouchers*					
				Total	*Project-based*	*Tenant-Based*	*Special Purpose Vouchers*		
							Veterans Affairs Supportive Housing	*Family Unification Program*	*Disabled**
# of units/ vouchers	0	301	0	3,571	0	3,480	52	0	0
*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition									
Data Source: PIC (PIH Information Center)									

2. *Characteristics of Residents*

Table 23 – Characteristics of Public Housing Residents by Program Type

Criteria	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-Based	Special Purpose Vouchers		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# Homeless at admission	0	11	0	19	0	10	9	0	0
# of Elderly Program Participants (>62)	0	24	0	646	0	638	6	0	0
# of Disabled Families	0	90	0	1,356	0	1,303	28	0	0
# of Families requesting accessibility features	0	301	0	3,571	0	3,480	52	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0	0
*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition									

Data Source: PIC (PIH Information Center)

3. *Race of Residents*

Table 24 – Race of Public Housing Residents by Program Type

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-Based	Special Purpose Vouchers		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
White	0	235	0	2,823	0	2,740	50	0	0
Black/ African American	0	6	0	30	0	29	1	0	0
Asian	0	1	0	16	0	15	0	0	0
American Indian, Alaska Native	0	59	0	696	0	690	1	0	0
Pacific Islander	0	0	0	6	0	6	0	0	0
Other	0	0	0	0	0	0	0	0	0
*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition									
Data Source: PIC (PIH Information Center)									

4. Ethnicity of Residents

Table 25 – Ethnicity of Public Housing Residents by Program Type

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-Based	Special Purpose Vouchers		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Hispanic	0	13	0	122	0	121	1	0	0
Not Hispanic	0	288	0	3,449	0	3,359	51	0	0
*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year, and Nursing Home Transition									
Data Source: PIC (PIH Information Center)									

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units.

According to the *Desk Guide for Using IDIS to Prepare the Consolidated Plan, Annual Action Plan, and CAPER/PER*, version March 2015, State Grantees are not required to complete this section.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

According to the *Desk Guide for Using IDIS to Prepare the Consolidated Plan, Annual Action Plan, and CAPER/PER*, version March 2015, State Grantees are not required to complete this section.

How do these needs compare to the housing needs of the population at large

According to the *Desk Guide for Using IDIS to Prepare the Consolidated Plan, Annual Action Plan, and CAPER/PER*, version March 2015, State Grantees are not required to complete this section.

NA-40 Homeless Needs Assessment

Introduction

According to HUD, a national focus on homeless rights during the Reagan administration helped to form much of the way homeless needs are addressed today. During the early 1980s, the administration determined that the needs of the homeless were best handled on a state or local level rather than a national level. In 1983, a federal task force was created to aid local and regional agencies in their attempts to resolve homeless needs, and in 1986, the Urgent Relief for the Homeless Act was introduced, which chiefly established basic emergency supplies for homeless persons such as food, healthcare and shelter. The act was later renamed the McKinney-Vento Act, after the death of one of its chief legislative sponsors, and was signed into law in 1987.

HUD has historically defined the term “homeless” according to the McKinney-Vento Act, which states that a person is considered homeless if he/she lacks a fixed, regular and adequate night-time residence. A person is also considered homeless if he/she has a primary night time residence that is:

- A supervised publicly or privately operated shelter designed to provide temporary living accommodations;
- An institution that provides a temporary residence for individuals intended to be institutionalized; and,
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.[1]

Within this context, homelessness can be defined as the absence of a safe, decent, stable place to live. A person who has no such place to live stays wherever he or she can find space, such as an emergency shelter, an abandoned building, a car, an alley, or any other such place not meant for human habitation.

Homeless sub-populations tend to include those with substance abuse and dependency issues, those with serious mental illness, persons living with HIV/AIDS, women and other victims of domestic violence, emancipated youth, and veterans.

The recent rise in the homeless population finds cause in many areas. These include declines in personal incomes, losing jobs, the lack of affordable housing for precariously-housed families, and individuals who may be only a paycheck or two away from eviction. It takes only one additional personal setback to precipitate a crisis that would cause homelessness for those at risk of homelessness. Furthermore, deinstitutionalization of patients from psychiatric hospitals without adequate community clinic and affordable housing support creates situations primed for homelessness. Personal vulnerabilities also have increased, with more people facing substance abuse problems, diminished job prospects, or health difficulties while lacking medical coverage.

Satisfying the needs of the homeless population therefore represents both a significant public policy challenge as well as a complex problem due to the range of physical, emotional and mental service needs required.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Data necessary to estimate the information requested in the grayed out columns in the table is not currently available for Montana's homeless population, nor does it appear feasible to infer a response from the existing data.

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

The nature of the homeless individuals and families in Montana vary for many different reasons. It may be a mother and her children that due to domestic violence must leave their homes to avoid injury, or a veteran due to the lack of medical assistance, prefers to live in a tent outside of town, or the transient family that is desperately looking for work but can't find any that meets their skill levels. In the rural areas, homelessness isn't as noticeable many times as in the urban areas. 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. Montana's rural areas, a sudden job loss due to a business closing can put a family quickly at risk of losing their home due to the lack of other jobs in

[1] The term "homeless individual" does not include any individual imprisoned or otherwise detained pursuant to an Act of Congress or a state law (42 U.S.C. § 11302(c)). HUD also considers individuals and families living in overcrowded conditions to be "at risk" for homelessness.

the area in which they wish to stay. The family then has to make a choice as to pick up and move from their support system or stay and find other means of staying out of homelessness.

The U.S. Department of Housing and Urban Development (HUD) released the 2014 Annual Homeless Assessment Report[2] (AHAR) documenting the national issues related to homelessness. As documented in the AHAR, Montana had an 84.4% increase in the number of homeless individuals between 2007 through 2014; and has the 5th highest rate (57.8%), among all states, of unsheltered homeless individuals in 2014 (1,167 homeless and 674 unsheltered individuals). Unfortunately the AHAR report stated, "Montana also had very high rates of unsheltered unaccompanied children and youth with 74 percent". Additionally, Montana has the highest rate of unsheltered veterans in the nation (63.3%). Montana's population has a high percentage of veterans, one in ten individuals in the state are veterans. Lastly, between 2007 and 2014, Montana has experienced the largest change in the number of chronically homeless individuals in the nation, at a staggering 208.4% increase in a seven year period. While homelessness has declined nationally, reducing homelessness for veterans, children and youths, and the chronically homeless is a critical priority in Montana.

At the time of the 2014 Point-In-Time Count (PIT), Montana's homeless population was a majority of white persons that were either a family with children (62.7%) or a household of just adults (65.7%). Men represent majority of single respondents (58.4%), while women represent the majority of families with children (53.4%). Families with children represent a greater number of households in both the sheltered (65.3%) and unsheltered (57.8%) populations.

Data for the number of persons becoming and exiting homelessness each years is not currently available for Montana's homeless population, nor does it appear feasible to infer a useful response to this category from the existing data.

During the 2014 Montana PIT survey, in response to the question, "How long has it been since you had a place you considered home or a permanent place to live?" respondents answered as shown in the table below.

Table NA-40.A - "How long has it been since you had a place you considered home or a permanent place to live?"

Length of Time	*Chronically Homeless*		*Military Veterans*		*Families with Children*	*Un-accompanied Youth*
	Individuals	*Families*	*Individuals*	*Families*		
1 week or less	2	0	101	19	124	11
More than 1 week but less than 30 days	16	0	35	2	165	7
More than 1 month	16	2	44	4	141	5
More than 3 months	13	1	52	5	147	5
More than 6 months	11	2	58	4	95	6
More than 1 year	64	6	47	3	75	5
More than 2 years	163	5	132	5	19	2
Missing or N/A	0	0	34	4	918	2
Total	285	16	503	46	1684	43
Data Source: 2014 Montana Homeless Survey						

[2] https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=6&ved=0CEoQFjAF&url=https%3A%2F%2Fwww.hudexchange.info%2Fresources%2Fdocuments%2F2014-AHAR-Part1.pdf&ei=feaeVcqqJZPaoATpo7bIBg&usg=AFQjCNEuS1yqF3JHDsOXNZamFjRgR9b_fA

Nature and Extent of Homelessness: (Optional)

Table NA-40.B - Nature and Extent of Homeless Table

Race	***Sheltered***	***Unsheltered (optional)***
White	756	623
Black or African American	13	9
Asian	3	0
American Indian or Alaska Native	134	193
Pacific Islander	5	9
Ethnicity:	***Sheltered:***	***Unsheltered (optional)***
Hispanic	28	41
Not Hispanic	883	793
Data Source: 2014 Montana Homeless Survey		

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

According to the 2014 PIT results, the estimate for persons needing housing assistance in the state in any given year is approximately 2400 individuals. Individuals from households with families and households with adults only are both strongly represented in this population, so assistance needs to be available for both. Also there are approximately 250 veterans with or without families that can be expected to experience homelessness in Montana. The state also experiences the highest rate of homeless veterans living in unsheltered locations (63.3%).

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

According to the 2014 PIT results, the majority of the homeless population in Montana was white, at 57%. Individuals describing themselves as American Indian/Alaskan Native represented the second largest percentage at 33.8%.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Families with children represent a greater number of households in both the sheltered (65.3%) and unsheltered (57.8%) populations. In terms of the sheltered, the households cross every category of homelessness and every race. The major obstacle that may deter a household from getting assistance are the lack of shelters in a county or that the shelter only deals with one specific population such as domestic violence or veterans.

Nearly every county across the state has a homeless population, but in most of the state the unsheltered are difficult to locate. In the rural areas there are more homeless that find shelter with family members or friends for a short period of time, and in both the rural areas or just outside of the state's larger communities they may reside on public lands where they may live more or less undisturbed. For this reason it is very hard to determine the nature or extent of unsheltered homelessness.

Discussion

In Montana rural homelessness is described as any individual or family without a permanent, safe, and healthy living environment at night. This definition incorporates many different types of population including the domestic violence victim, veteran, disabled, single mother or father w/children, youth, or persons with HIV.

NA-45 Non-Homeless Special Needs Assessment

Introduction

According to HUD, special needs populations are "not homeless but require supportive housing, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify."[3] Because individuals in these groups face unique housing challenges and are vulnerable to becoming homeless, a variety of support services are needed in order for them to achieve and maintain a suitable and stable living environment. Each of these special needs populations will be discussed in terms of their size and characteristics, services and housing currently provided, and services and housing still needed.

Table 26– HOPWA Data

Current HOPWA formula use:	
Cumulative cases of Aids reported	1,225
Area incidence of AIDS	75 Case
Number of new cases prior year (3 years of data)	15-32 per year
Rate per population	60% in the following counties: Cascade, Flathead, Gallatin, Missoula, Yellowstone and Lewis & Clark
Rate per population (3 years of data)	N/A
Current HIV surveillance data	N/A
Number of Persons living with HIV (PLWH)	606+
Area Prevalence (PLWH per population)	N/A
Number of PLWA (AIDS Only)	364
Number of new HIV cases reported last year	22 (2013 report)
Data Source: 2013 HIV Annual Update: http://dphhs.mt.gov/publichealth/hivstd.aspx	

HIV Housing Need (HOPWA Grantees Only)

Table 27 – HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	***Estimates of Unmet Need***	***Source Comments***
Tenant based rental assistance	16	
Short-term rent, mortgage, and Utility	7	
Public Housing placement	23	
Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet; Reported in APR for 2 HOPWA Competitive Grants: 9/1/13-8/31/14		

Describe the characteristics of special needs populations in your community.

Elderly and Frail Elderly Persons

HUD provides a definition of "elderly" as persons age 62 or older. The U.S. National Center for Health Statistics (NCHS) notes that a number of older citizens have limitations caused by chronic conditions that constrain Activities of Daily Living (ADLs). ADLs are divided into three levels, from basic to advanced. Basic ADLs involve personal care and include tasks such as eating, bathing, dressing, using the toilet, and getting in or out of bed or a chair. Intermediate, or Instrumental Activities of Daily Living (IADLs) are tasks necessary for independent functioning in the community. These include cooking, cleaning, laundry, shopping, using the telephone, using or accessing transportation, taking medicines, and managing money. Social, recreational and occupational activities that greatly

[3] *Consolidated Plan Final Rule 24 CFR Part 91.* United States Department of Housing and Urban Development. Community Planning and Development. 1995. 14.

affect the individual's quality of life are Advanced Activities of Daily Living (AADL). Playing bridge, bowling, doing crafts, or volunteering for one's church are examples of Advanced ADLs. “Frail elderly” is defined as persons who are unable to perform three or more activities of daily living.[4]

Size and Characteristics

According to 2010 Census Bureau data, 146,742 residents in the State of Montana were age 65 or older, which equated to about 14.8 percent of the total population. Table NA-45.A presents a breakdown of the elderly population by age in Montana at the time of the 2010 census. While elderly is defined as persons over 62, “extra elderly” persons are those over the age of 75. Within the elderly population in Montana, 45.0 percent were extra elderly. According to the State of Montana’s Aging Services Unit, by the year 2025 Montana will have the fifth highest per capita older population in the United States.[5] The elderly population in Montana grew 21.3 percent between 2000 and 2010. The two age groups with the greatest growth over this decade were those ages 65 to 66, with 49.2 percent growth, and those aged 67 to 69, with 38.8 percent growth.

Table NA-45.A - Elderly Population by Age

Age	*2000 Census*		*2010 Census*		*% Change*
	Population	*% of Total*	*Population*	*% of Total*	
65 to 66	13,279	11.0%	19,811	13.5%	49.2%
67 to 69	19,262	15.9%	26,745	18.2%	38.8%
70 to 74	29,978	24.8%	34,186	23.3%	14.0%
75 to 79	24,703	20.4%	25,637	17.5%	3.8%
80 to 84	18,390	15.2%	20,342	13.9%	10.6%
85 or Older	15,337	12.7%	20,021	13.6%	30.5%
Total	120,949	100.0%	146,742	100.0%	21.3%
Data Source: *2000 & 2010 Census SF1 Data*					

People with Disabilities (Mental, Physical, Developmental)

HUD defines a person with a disability as any person who has a physical or mental impairment that substantially limits one or more major life activities. Physical or mental disabilities include hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS related complex, and mental delay that substantially limits one or more major life activities. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks and caring for oneself.[6] HUD defers to Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 for the definition of developmental disability: a severe, chronic disability of an individual that is attributable to a mental or physical impairment or combination of mental and physical impairments.

Many persons with disabilities require support services in order to maintain healthy lifestyles. The services that are required often depend on the individual and the type of disability. For example, a person with a mental disability may require medical assistance, weekly counseling sessions, or job placement assistance. Specialized transport services and physical therapy sessions are services that might be required for a person with a physical disability.

Many people with disabilities live on fixed incomes and thus face financial and housing challenges similar to those of the elderly. Without a stable, affordable housing situation, persons with disabilities can find daily life challenging. In addition, patients from psychiatric hospitals and structured residential programs have a hard time

[4] http://law.justia.com/us/cfr/title24/24-4.0.2.1.12.2.3.2.html
[5] http://www.dphhs.mt.gov/sltc/services/aging/Newsletter/2012May.pdf
[6] http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/inhousing

transitioning back in to mainstream society without a reasonably priced and supportive living situation. The U.S. Conference of Mayors 2013 Hunger and Homeless Survey found that mental illness was cited 44 percent of the time as a cause of homelessness among unaccompanied individuals. Likewise, they reported that 30 percent of homeless adults in their cities had severe mental illness.[7]

Size and Characteristics

Data from the 2012 Five-Year American Community Survey for Montana showed a total population of persons with disabilities of 127,803, with an overall disability rate of 13.1 percent. Table NA-45.B presents a tally of disabilities by age and gender. The age group with the highest disability rate is persons aged 75 and older. Males had a slightly higher disability rate at 13.9 percent, than females, at 12.3 percent. Children under 5 had the lowest disability rate, at less than one percent for both males and females.

Table NA-45.C breaks down disabilities by disability type for persons aged 5 and older, from the 2000 census data. The most common disability is a physical disability, followed by an employment disability. The third most common disability type is a mental disability.

Table NA-45.B - Disability by Age

Age	*Male*		*Female*		*Total*	
	Disabled Population	*Disability Rate*	*Disabled Population*	*Disability Rate*	*Disabled Population*	*Disability Rate*
Under 5	155	.5%	188	.6%	343	.6%
5 to 17	5,059	6.1%	3,188	4.1%	8,247	5.1%
18 to 34	7,481	6.9%	5,467	5.3%	12,948	6.1%
35 to 64	28,874	14.6%	24,357	12.2%	53,231	13.4%
65 to 74	12,068	30.2%	8,913	22.1%	20,981	26.1%
75 or Older	14,191	52.2%	17,862	50.2%	32,053	51.1%
Total	67,828	13.9%	59,975	12.3%	127,803	13.1%
Data Source: 2012 Five-Year ACS Data						

Table NA-45.C - Total Disabilities Tallied: Aged 5 and Older

Disability Type	*Population*
Sensory disability	36,572
Physical disability	71,541
Mental disability	41,086
Self-care disability	17,107
Employment disability	53,146
Go-outside-home disability	39,271
Total	258,723
Data Source: 2000 Census SF3 Data	

People with Alcohol or other Drug Addictions

According to the National Coalition for the Homeless, for persons "just one step away from homelessness, the onset or exacerbation of an addictive disorder may provide just the catalyst to plunge them into residential instability."[8] For persons suffering from addictions to drugs and alcohol, housing is complicated. Persons who have stable housing are much better able to treat their addictions. However, obtaining stable housing while suffering from addiction can be quite difficult, and the frustrations caused by a lack of housing options may only exacerbate

[7] http://www.usmayors.org/pressreleases/uploads/2013/1210-report-HH.pdf
[8] http://www.nationalhomeless.org/publications/facts/addiction.pdf

addictions. According to the 2013 U.S. Conference of Mayors Hunger & Homelessness Report, substance abuse is one of the most cited causes of homelessness.[9]

Size and Characteristics

The Montana Department of Public Health & Human Services (DPHHS) published the 2012 Montana Prevention Needs Assessment Survey that was conducted in schools across the state to evaluate adolescent substance abuse.[10] The state as a whole saw a decline in adolescent alcohol use from almost 50 percent of survey respondents indicating they had ever used alcohol in 2008 to closer to 44 percent in 2012. Other adolescent drug use was also reported in this document. The Addictive and Mental Disorders' Chemical Dependency Bureau also provided data on chemical dependency treatment and prevention activities by county.[11] Each county had varying levels of drug use and treatment. In addition, the Trust for America's Health found that Montana had the 21st highest drug overdose mortality rate in the United States in 2013, with 12.9 per 100,000 people suffering drug overdose fatalities.[12] The report found that the majority of overdose death, a majority of which were from prescription drugs, had doubled in Montana since 1999.

Persons with HIV/AIDS

Studies show that housing assistance enables persons living with HIV/AIDS to achieve housing stability, improve health outcomes, and reduce overall public costs. Housing is also identified as a strategic point of intervention to address HIV/AIDS and overlapping vulnerabilities (such as age, race, mental illness, drug use, or chronic homelessness). The data reported represents the number of households reported to be waiting for housing assistance per assistance type. Totals provided in the tables for HOPWA figures are based the HOPWA Consolidated Annual Performance and Evaluation Report (CAPER) and Beneficiary Worksheet.

Size and Characteristics

According to information gathered from the DPHHS, a total of 548 persons were living with HIV infection in Montana as of 2012[13]. A total of 1,126 cases of HIV have been reported in Montana, of which more than 400 persons are known to have died by 2012. The HIV Epidemiology Profile for Montana in 2012 released additional data regarding characteristics of those diagnosed with HIV. Males have attributed for 86 percent of this population. The largest age group that has received diagnoses were those aged 30 to 39, accounting for 37 percent. Non-Hispanic, white persons have the account for the highest portion of the HIV population with 85 percent.

Diagnoses were broken down by county. Missoula and Yellowstone counties had the highest number of new diagnoses, followed by Cascade County, then by Lewis and Clark, Flathead, Gallatin, and Butte-Silver Bow. This is also consistent with the counties with the highest population of persons living with HIV.

Victims of Domestic Violence

Domestic violence describes behaviors that are used by one person in a relationship to control the other. This aggressive conduct is often criminal, including physical assault, sexual abuse, and stalking. The U.S. Department of

[9] http://www.usmayors.org/pressreleases/uploads/2013/1210-report-HH.pdf
[10] http://prevention.mt.gov/pna/2012/01.%20State%20Data/State%20of%20Montana%20Profile%20Report.pdf
[11] http://www.dphhs.mt.gov/amdd/chemicaldependencyservices/documents/countysnapshots.pdf
[12] http://healthyamericans.org/reports/drugabuse2013/release.php?stateid=MT
[13] http://www.dphhs.mt.gov/publichealth/hivstd/documents/2012HIV-STDupdate.pdf

Justice defines domestic violence as a pattern of abusive behavior in any relationship that is used by one partner to gain or maintain power and control over another intimate partner.[14] Victims can be of all races, ages, genders, religions, cultures, education levels, and marital statuses. Victims of domestic violence are at risk of becoming homeless due to an unstable living environment. If domestic violence victims flee the home, they are often faced with finding emergency shelter and services for themselves and their children. Victims of domestic violence are predominantly women. However, children can also be affected as either victims of abuse or as witnesses to abuse. The U.S. Department of Justice found that throughout their lifetime, over 25 million women and 7 million men were victimized by an intimate partner.[15]

Size and Characteristics

Pinpointing a specific number of victims of domestic violence can be difficult because many cases go unreported. However, there are other means of gathering statistics, including tracking the numbers of cases that are reported to law enforcement. According to the National Coalition Against Domestic Violence, there were 11,562 victims of domestic violence in 2003, with 11 homicides noted to be a result of domestic violence.[16]

The 2014 Point-in-Time homeless count indicated 133 homeless victims of domestic violence in Montana. In addition, the 2013 Montana Homeless Survey indicated 294 victims of domestic abuse. Of these survey respondents and their families, 92.9 percent were female. Table NA-45.D shows these counts.

Table NA-45.D - Victims of Domestic Violence

Gender	*Count of Respondents*	*Count of Respondents and Family*
Males	14	2
Female	45	286
Missing or N/A	1	0
Total	60	288
Data Source: 2014 Montana Homeless Survey		

Victims of domestic violence accounted for 6.5 percent of Montana's homeless population in the 2014 Point-in- Time count. During a portion of the public input meetings, the Montana Department of Commerce received additional comments about homelessness and domestic violence:

- 50 percent of cities surveyed cite domestic violence as a primary cause of homelessness (US Conference of Mayors, 2005);
- Approximately 63 percent of all homeless women have experienced domestic violence (National Network to End Domestic Violence); and,
- One in three women will experience domestic or sexual abuse in her lifetime; one in four women will experience severe physical violence (World Health Organization, 2013).[17]

[14] http://www.ovw.usdoj.gov/domviolence.htm
[15] https://www.ncjrs.gov/pdffiles1/nij/183781.pdf
[16] http://www.ncadv.org/files/Montana%202.09.pdf
[17] Erica Aytes Coyle, Interim Co-Director/Development Director, HAVEN (27 May 2014)

What are the housing and supportive service needs of these populations and how are these needs determined?

Elderly and Frail Elderly Persons

The Older Americans Act of 1965 has been the main instrument for delivering social services to senior citizens in the U.S. This Act established the federal Administration on Aging (AoA) and related state agencies to specifically address the many needs of the elderly U.S. population. Despite limited resources and funding, the mission of the Older Americans Act is broad: "to help older people maintain maximum independence in their homes and communities and to promote a continuum of care for the vulnerable elderly."[18] The AoA encompasses a variety of services aimed at the elderly population, such as supportive services, nutrition services, family caregiver support, and disease prevention and health promotion.

In Montana, support for the elderly population is provided by the Senior and Long Term Care Division, and the Aging Services Unit, within the State's Public Health and Human Services Department. This state unit administers a wide variety of senior based services for residents over age 60, with the goal to provide services that allow seniors to remain independent.[19] The unit's programs and services include adult protective services, long term care resources, information and referral services, legal resources, community resources, and financial planning.

The 2012-2105 Montana State Plan on Aging outlines the fundamental concerns facing Montanans as the population continues to age.[20] Montana's State Plan on Aging includes the following goals:

- Goal 1: To strengthen the core services provided by Montana's Aging Services Network, especially in our frontier areas of Montana;
- Goal 2: Expand ADRC coverage in Montana by 2015;
- Goal 3: To continue developing a sustainable Legal Services Developer Program to enhance access to legal assistance, support and education to Montana's elders;
- Goal 4: Strengthen and expand the Ombudsman program to meet the increased growth in the number of facilities and the ever changing and challenging needs of the residents; and,
- Goal 5: Coordinate with the Aging and Disabilities networks to look at enhancing and further develop the service delivery system to improve and increase services, especially in frontier areas of Montana.

Services and Housing Needed for Elderly

While there are a number of different housing and service programs that aid the elderly population in Montana, the general population is continuing to age and live longer, which will require additional services and resources to meet the ever growing needs of the elderly. The Montana State Plan on Aging identifies various needs for the elderly, including care/case management, caregiving support, elder abuse prevention, employment, health care/health/mental health, health insurance, health promotion, housing, and others. The DPHHS also indicated that in 2007, 35.6 percent of clients utilizing in-home services were living in poverty.[21]

According to the Center for Housing Policy, housing will be a priority need for the elderly population. A growing number of older households will face severe housing costs burdens, and many will require assisted or long-term

[18] http://www.nhpf.org/library/the-basics/Basics_OlderAmericansAct_02-23-12.pdf
[19] http://www.dphhs.mt.gov/sltc/services/aging/index.shtml
[20] http://www.dphhs.mt.gov/sltc/services/aging/StatePlanAging/StatePlanFinal2011.pdf
[21] http://www.dphhs.mt.gov/sltc/services/aging/Reports/2007AgingReport.pdf

care housing and services.[22] In addition, as the Baby Boomer generation continues to grow, many will prefer to remain independent, requiring in-home services and adaptions to existing homes. Thus, there is a greater focus on in-home care and expanded home health services to meet the needs of a more independent elderly population. Because most elderly persons are on a fixed income, these increasing costs may fall on publically funded programs in the state.

Services and Housing Currently Provided for Persons with Disabilities

In 2010, the Disability Services Division of the DPHHS changed its name to the Developmental Services Division. The Developmental Disabilities Program contracts with private, non-profit corporations to provide services across the lifespan for individuals who have developmental disabilities and their families. The focus of the program is to tailor care to the individual and provide it in as natural environment as possible.[23] The Montana Development Center is administered by the Developmental Disabilities Program and is the State's only residential facility for individuals with developmental disabilities that provides 24-hour care for those with the most severe behaviors or severe self-help deficits. However, during the 2015 legislative session, closure of the Montana Development Center was passed and will go into effect once a transition plan has been established. Over the next 18 months, a transition planning committee will be determining the best way to house and treat people who have severe intellectual disabilities, mental health issues and personality disorders.

Services and Facilities Needed for Persons with Disabilities

The Housing and Community Development Survey also asked participants to rank the need for services and facilities for persons with disabilities. The results, shown below, indicate a strong need for housing for both persons with physical disabilities and developmental disabilities, with over 45 percent of respondents indicating a medium to high level of need for services and facilities for both groups.

Table NA-45.E - Need for services and facilities for persons with physical and developmental disabilities

	No Need	*Low Need*	*Medium Need*	*High Need*	*Missing*	*Total*
Persons with physical disabilities	5	16	60	55	108	244
Persons with developmental disabilities	3	18	69	48	106	244
Data Source: 2014 Housing and Community Development Survey						

Services and Housing Currently Provided for Persons with Addictions

Addictive and Mental Disorders Division (AMDD) is the designated state adult mental health agency for the Montana Department of Public Health and Human Services (DPHHS). The mission of AMDD is to implement and improve an appropriate statewide system of prevention, treatment, care, and rehabilitation for Montanans with mental disorders or addictions to drugs or alcohol.

Through the Chemical Dependency Bureau, AMDD assesses the need for chemical dependency treatment and prevention services throughout Montana. Those services are available through contracts with 20 state-approved programs that practice a co-occurring approach to treatment. The bureau reimburses for a full range of outpatient and inpatient services, as well as education programs for DUI offenders and youth charged as a Minor in Possession. The Chemical Dependency Bureau also organizes and funds activities designed to prevent the use of

[22] Lipman, Barbara., Jeffery Lubell, Emily Salmon. "Housing an Aging Population: Are We Prepared?" *Center for Housing Policy* (2012). 21 May 2014 <http://www.nhc.org/media/files/AgingReport2012.pdf>.
[23] http://www.dphhs.mt.gov/dsd/index.shtml

alcohol, tobacco, and other drugs by youth and the abuse of those substances by adults. People with substance abuse disorders who have family incomes below 200% of the federal poverty level are eligible for public funded treatment services. In addition, the Medicaid program funds outpatient and residential chemical dependency treatment for adults and adolescents who are Medicaid eligible.

The Montana Chemical Dependency Center, located in Butte, is the only in-patient chemical dependency treatment center administered by the state. It has 16 treatment beds for men, 16 treatment beds for women, and 16 beds for withdrawal management.[24]

Services and Housing Needed for Persons with Addictions

According to the Healthy People 2020 national objectives, there were 22 million Americans struggling with a drug or alcohol problem in 2005. Of those with substance abuse problems, 95 percent are unaware of their problem.[25] Obtaining treatment is a primary concern for many, which often includes high costs and other impacts on the person's ability to obtain or retain an income and housing.

The National Coalition for the Homeless notes that other needs for persons living with addictions to drugs or alcohol include transportation and support services, including work programs and therapy access. Barriers also include programs that follow abstinence-only policies. These programs are often unrealistic for persons suffering from addictions because they fail to address the reality of relapses. A person living in supportive housing with an addiction problem who experiences a relapse may suddenly become a homeless person.[26]

Results from the 2014 Housing and Community Development Survey, presented below, show that respondents indicated a high need level for additional services and facilities for this special needs group.

Table NA-45.F - Need for Services and Facilities For Persons with Addiction

	No Need	*Low Need*	*Medium Need*	*High Need*	*Missing*	*Total*
Persons with substance abuse addictions	5	19	54	60	106	244
Data Source: 2014 Housing and Community Development Survey						

Services and Housing Currently Provided for Persons with HIV/AIDS

A combination of private non-profit providers and the DPHHS provide HIV/AIDS services in Montana. As part of the effort to combat HIV in the state, the DPHHS orchestrates the HIV Prevention Program. The State of Montana instituted the AIDS Prevention Act in 1997, and revised it in 2009. The Act institutes routine testing. The DPHHS also has a HIV/AIDS Treatment Program. The DPHHS works in collaboration with local city-county health departments, as well as community based organizations to provide the following services for eligible HIV positive individuals:

- AIDS Drug Assistance Program: This program provides anti-retrovirals, protease inhibitors, hydroxyurea and pentamidine to qualified individuals at no cost.
- Health Insurance Continuum of Coverage Program: This program allows eligible individuals to continue their private health insurance by paying all or part (up to $800) of their monthly premiums.

[24] http://www.dphhs.mt.gov/mcdc/
[25] http://www.healthypeople.gov/2020/TopicsObjectives2020/overview.aspx?topicId=40#star
[26] http://www.nationalhomeless.org/publications/facts/addiction.pdf

- HIV Case Management: The goal of the case managers is to deliver comprehensive outpatient health and support services to meet the HIV- related needs of individuals and families with HIV. Seven case management sites in the state serve the governor's five planning regions.[27]

HIV testing and services are provided by numerous public health clinics throughout the state. Free HIV testing is also provided by many non-profit organizations along with a bevy of other services, such as case management, transitional housing, housing referrals, food pantries, direct financial assistance, support groups and mental health counseling. A partial list of HIV service providers in Montana is provided in Table NA-45.G.

Table NA-45.G - HIV Service Providers

Service Organization	*Location*
Yellowstone AIDS Project	Billings
Rocky Boy Tribal Health	Box Elder
Bridger Clinic	Bozeman
Browning Tribal Health	Browning
Butte AIDS Support Services	Butte
Dawson County Health Department	Glendive
Hill County Health Department	Havre
Lewis and Clark City-County Health Department	Helena
Flathead City-County Health Department	Kalispell
Central Montana Family Planning	Lewistown
Open AID Alliance	Missoula
Partnership Health Center	Missoula
Data Source: DPHHS	

Services and Housing Needed for Persons with HIV/AIDS

Persons living with HIV/AIDS have multiple needs in terms of services. In addition to receiving regular medical attention, case management, and income support, many persons need access to permanent housing solutions. According to the U.S. Department of Housing and Urban Development, 9 out of 10 persons utilizing HOPWA benefits are extremely low to low income. [28] Increased funding for housing for persons living with HIV/AIDS is one of the greatest needs of the HIV/AIDS support programs. For example, there is generally a high need for increased scattered site housing availability, because traditional assisted housing options that involve grouping funding recipients in one site or complex are ineffective in that they can endanger the confidentiality of residents. Additionally, program recipients have a need for longer-term housing options. As the treatment of AIDS has advanced, people are living longer with the disease. Thus longer-term housing options are needed. However, the funding of these long-term housing options can be expensive.

As seen below, close to 30 percent of respondents indicated a medium to high need level for services and facilities for persons with HIV/AIDS.

Table NA-45.H - Need for services and facilities for Persons with HIV/AIDS

	No Need	*Low Need*	*Medium Need*	*High Need*	*Missing*	*Total*
Persons with HIV/AIDS	10	50	56	18	110	244
Data Source: 2014 Housing and Community Development Survey						

[27] http://www.dphhs.mt.gov/publichealth/hivstd/treatmentprogram.shtml
[28] https://www.onecpd.info/resources/documents/HOPWA-Fact-Sheet.pdf

Services and Housing Currently Provided for Victims of Domestic Violence

The Montana Coalition Against Domestic & Sexual Violence is a statewide coalition of individuals and organizations working together to end domestic and sexual violence through advocacy, public education, public policy, and program development. The Coalition's goals are to eliminate all forms of oppression, to provide support, network opportunities and training, and to encourage increased awareness and understanding[29].

Services for victims of domestic abuse are provided by a variety of non-profit and faith-based organizations across the state. Many of the shelters have 24-hour crisis lines and offer temporary housing, advocacy, referral programs, counseling, and transportation, as well as many other services. A partial list of domestic violence service providers is shown in Table NA-45.I.

Table NA-45.I - Domestic Violence Service Providers

Homeless Service Organization	***Counties Served***
Rosebud & Treasure County Victim Witness Program	Rosebud, Treasure
Women's Resource Center of Glasgow	Valley, Daniels, Sheridan, Philips, Roosevelt
Dawson County Domestic Violence & Sexual Assault Program	Dawson, Wibaux, Prairie
Phillips County Domestic Violence Program	Phillips
Custer Network Against Domestic Abuze & Sexual Assault	Custer, Rosebud, Treasure, Garfield, Powder River
Richland County Coalition Against Domestic Violence	Richland & McCone
The Family Violence Resource Center	Richland & McCone
The Family Violence Resource Center	Fort Peck Reservation
Northeast Montana Victim/Witness Program	Phillips, Valley, Roosevelt, Sheridan, Daniels Counties
Billings Area Family Violence Task Force	Yellowstone
YWCA Billings – Gateway	Yellowstone, Carbon, Stillwater, Big Horn, Rosebud and Musselshell
Tri-County Victim/Witness Program	Stillwater, Sweet Grass, Carbon
Crow Victims Assistance Program	Crow Reservation
Healing Hearts	Northern Cheyenne Reservation
Tri-County Network	Meagher, Park, Sweet Grass
Custer Network Against Domestic Abuse & Sexual Assault (CNADA)	Custer, Carter, Fallon, Garfield, and Powder River
Domestic and Sexual Violence Services of Carbon County	Carbon and Stillwater
Rocky Mountain Victims Program	Blackfeet Reservation
Hi-Lines Help for Abused Spouses	Chouteau, Glacier, Toole, Teton, Pondera, Liberty
Mercy Home	Cascade, Toole, Pondera, Teton, Glacier, Chouteau, Judith Basin, Meagher, Liberty
Fergus County Attorney Victim Assistance Program	Fergus, Petroleum, Judith Basin
Gallatin County Victim Assistance	Gallatin County and the City of Bozeman
HAVEN	Gallatin, Madison, Meagher
Women's Resource Center/Community Support Center	Beaverhead & Madison
SAFE	Ravalli
The Abbie Shelter	Flathead
Mineral County Help Line	Mineral
Sanders County Coalition for Families	Sanders
Data Source: Montana Coalition Against Domestic Violence	

Services and Housing Needed for Victims of Domestic Violence

Results from the 2014 Housing and Community Development Survey indicated a medium to high need level for additional domestic violence facilities and services in Montana.

[29] http://mcadsv.com/about/philosophy/

Table NA-45.J - Need for Services and Facilities for Victims of Domestic Violence

	No Need	*Low Need*	*Medium Need*	*High Need*	*Missing*	*Total*
Victims of domestic violence	4	12	57	64	107	244
Data Source: 2014 Housing and Community Development Survey						

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area

According to information gathered from the DPHHS, a total of 548 persons were living with HIV infection in Montana as of 2012[30]. A total of 1,126 cases of HIV have been reported in Montana, of which more than 400 persons are known to have died by 2012. The HIV Epidemiology Profile for Montana in 2012 released additional data regarding characteristics of those diagnosed with HIV. Males have attributed for 86 percent of this population. The largest age group that has received diagnoses were those aged 30 to 39, accounting for 37 percent. Non-Hispanic, white persons have the account for the highest portion of the HIV population with 85 percent.

NA-50 Non-Housing Community Development Needs Assessment

Describe the jurisdiction's need for Public Facilities

The 2014 Montana Housing and Community Development Survey was distributed to stakeholders throughout the state. A total of 244 survey responses were received. Participants asked to rate the need for a set of specific community and economic development needs.

As seen in Table NA-50.A, respondents indicated the highest level of need for childcare facilities, followed by healthcare and youth centers. The Community and Public Facilities Focus Group indicated that many priorities vary by differing populations throughout the state.

Table NA-50.A - Need for Community and Public Facilities

Facility	*No Need*	*Low Need*	*Medium Need*	*High Need*	*Missing*	*Total*
Childcare facilities	4	11	67	59	103	244
Healthcare facilities	5	23	64	49	103	244
Youth centers	3	22	78	40	101	244
Senior centers	5	18	80	38	103	244
Parks and recreational centers	6	28	72	35	103	244
Residential treatment centers	6	31	71	32	104	244
Community centers	4	24	83	31	102	244
Public buildings with improved accessibility	6	31	58	31	118	244
Other infrastructure activities	4	1	2	5	232	244
Data Source: 2014 Montana Housing and Community Development Survey						

How were these needs determined?

The community development needs for the state of Montana were determined based on responses to the 2014 Housing and Community Development Needs survey and from applications received during the past five year period.

[30] http://www.dphhs.mt.gov/publichealth/hivstd/documents/2012HIV-STDupdate.pdf

Describe the jurisdiction's need for Public Improvements.

Participants to the 2014 Montana Housing and Community Development Survey were also asked to prioritize public improvements. Table NA-50.B shows the highest ranking for water system capacity improvements and street and road improvements. This was followed by sewer system improvements and sidewalk improvements. The Focus Groups also indicated the need for infrastructure to accommodate growth, including streets and water systems for increased housing. The comments also included the need to update aging water systems throughout the state, and the varying levels of need throughout the state depending on location.

Table NA-50.B - Need for Infrastructure Improvements

Improvement	*No Need*	*Low Need*	*Medium Need*	*High Need*	*Missing*	*Total*
Water system capacity improvements	1	13	42	86	102	244
Street and road improvements	1	9	50	85	99	244
Sewer system improvements	1	16	41	85	101	244
Sidewalk improvements	4	19	53	68	100	244
Water quality improvements	5	22	47	68	102	244
Storm sewer system improvements	2	24	53	64	101	244
Flood drainage improvements	4	15	61	63	101	244
Bridge improvements	2	21	59	59	103	244
Solid waste facility improvements	4	21	58	58	103	244
ADA improvements to local infrastructure	4	19	63	56	102	244
Bicycle and walking paths	8	32	51	53	100	244
Other infrastructure activities	4	1	2	5	232	244
Data Source: 2014 Montana Housing and Community Development Survey						

How were these needs determined?

The community development needs for the state of Montana were determined based on responses to the 2014 Housing and Community Development Needs survey and from applications received during the past five year period.

Describe the jurisdiction's need for Public Services

Participants to the 2014 Montana Housing and Community Development Survey were also asked to prioritize public improvements. Table NA-50.C shows the need for human and public services. The highest needs indicated were for mental health/chemical dependency services and senior services. This was followed by transportation services, healthcare services, and childcare services.

Table NA-50.C - Need for Public Services

Public Service	*No Need*	*Low Need*	*Medium Need*	*High Need*	*Missing*	*Total*
Mental health/chemical dependency services	4	14	42	79	105	244
Senior services	3	8	61	69	103	244
Transportation services	4	9	61	67	103	244
Healthcare services	5	14	59	64	102	244
Childcare services	5	7	72	58	102	244
Employment services	6	16	66	52	104	244
Homebuyer education	5	20	75	41	103	244
Youth centers	3	22	78	40	101	244
Tenant/Landlord counseling	11	28	61	40	104	244
Fair housing education	14	26	62	38	104	244
Fair housing activities	15	28	61	36	104	244
Crime awareness education	10	32	73	24	24	244

Mitigation of asbestos hazards	13	47	60	20	104	244
Mitigation of radon hazards	16	52	56	14	106	244
Mitigation of lead-based paint hazards	16	54	58	13	103	244
Other public services	5		1	2	236	244
Data Source: 2014 Montana Housing and Community Development Survey						

Survey participants were given the opportunity to comment on barriers or constraints to addressing the community and economic development needs identified in the survey. In general, respondents felt that budget constraints, lack of employment opportunities, and bureaucratic impediments were the largest obstacles to serving community and economic development needs.

How were these needs determined?

The community development needs for the state of Montana were determined based on responses to the 2014 Housing and Community Development Needs survey.

Section IV: Market Analysis

MA-05 Overview

Housing Market Analysis Overview

Note this section of the Consolidated Plan is not being comprehensively updated with specific details related to economic, social, environmental, and community impacts related to the COVID-19 repercussions. The State of Montana is modifying this Consolidated Plan to broaden the use of CDBG funds through the full use of all National Objectives: Urgent Need, Slums and Blight and Low and Moderate Income. The expansion of the use of CDBG will assist with the known and unknown response to community needs as the COVID-19 repercussions develop over the coming weeks and months. While there is no specific Needs Assessment that has been conducted, on March 13, 2020, Governor Bullock issued an Executive Order declaring a state of emergency to exist within the state of Montana related to the communicable disease COVID-19 novel coronavirus. Since this executive order, Governor Bullock has announced many directives to deploy resources to promote the safety and welfare of all Montanans. These actions identify the current needs of the state and the support needed that can come from the federal resources identified in this Plan Amendment and Annual Action Plan Amendments.

Montana is America's fourth largest state, encompassing more than 147,000 square miles; 607 square miles more than Maine, South Carolina, West Virginia, Maryland, Hawaii, Massachusetts, Vermont, New Hampshire, and Delaware combined. Montana shares its land mass with seven Tribal Nations that are located across the state.

Eastern Montana communities have been experiencing a steady decline in their populations, but recently there has been a drastic significant increase in their population and overall community needs that is directly related to the increased oil and gas production the Bakken region. As of the spring of 2012, the biggest change in housing needs in Montana reflects the current boom development of the Bakken Oil Field in eastern Montana and western North Dakota. Unemployment rates in Montana counties that border North Dakota are low, averaging 3.63% as of the April, 2012 report, and the housing stock has been overrun, leaving essentially no rentals or homes available. Rents have increased fourfold in some of the eastern Montana border counties. While incomes have also increased, especially for those working directly in the oil fields, consumer support jobs such as retail sales and other service jobs traditionally don't pay enough to make housing affordable. As Montana's oil deposits develop along the same lines as the deposits across the border in North Dakota, eastern Montana is facing major challenges to its housing stock, local community services and infrastructure. Billings, the closest large urban center to the Bakken in Montana, is also looking at tighter housing markets for both homes and rentals as oil field workers relocate their families to take advantage of Billings' services and schools. The extreme diversity in the available infrastructure and housing, age of housing stock, and overall range in population complicate the assessment of the type and degree of housing and community development needs.

At the other end of the state, unemployment in western Montana recreation counties averages 9.5% with both Lincoln and Sanders topping 14%. Home purchase costs in western Montana remain below the high levels of the housing boom, while rents have increased incrementally. However, the cost of housing remains a challenge to households whose incomes have not rebounded. Affordable housing continues to be a challenge on Montana's Indian reservations as well with housing in short supply and very high unemployment estimates ranging from 62.7% to 85.5% as self-reported by each Tribal Nation. Montana's January, 2012 homeless survey found 1,842 homeless persons, the highest number since the state initiated consistent data collection to meet federal homeless count standards in 2005. While the reasons for the housing challenges facing Montana in the spring of 2012 have changed

from those of a decade ago, overall housing today is less affordable and less available than it was in 2000.

MA-10 Number of Housing Units

Introduction

The following provides information about the housing market, the supply and demand for housing over time, building permit data and related price information for both rental properties and homeownership opportunities in Montana.

Table 28 – Residential Properties by Unit Number

Residential Unit Type	*Number*	*Percent*
1-unit detached structure	331,709	69%
1-unit, attached structure	13,442	3%
2-4 units	38,080	8%
5-19 units	25,211	5%
20 or more units	14,845	3%
Mobile Home, boat, RV, van, etc	54,743	11%
Total	478,030	100%
Data Source: 2007-2011 ACS		

Table 29 – Unit Size by Tenure

Unit Size	*Owners*		*Renters*	
	Number	*Percent*	*Number*	*Percent*
No bedroom	621	0%	5,631	4%
1 bedroom	9,257	3%	27,284	22%
2 bedrooms	61,600	22%	49,549	39%
3 or more bedrooms	206,435	74%	43,118	34%
Total	277,913	99%	125,582	99%
Data Source: 2007-2011 ACS				

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Housing needs in Montana are served by a number of programs:

- CDBG,
- HOME,
- the Low Income Housing Tax Credit Program (LIHTC),
- Section 8 assistance,
- Veterans Affairs Supportive Housing (VASH),
- Shelter Plus,
- Section 811 Supportive Housing for Persons with Disabilities,
- Emergency Solutions Grant and Rapid Re-Housing,
- Native American Housing Assistance and Self-Determination Act Program,
- United States Department of Agriculture Rural Development,
- Montana Veterans Home Loan Program,
- Score Advantage Down Payment Assistance Program, and
- Habitat for Humanity.

CDBG serves income-qualified households of low to moderate income (at or below 80% of Area Median Income) through housing, economic development and community development activities. Specific to housing needs, CDBG can provide assistance for first time homebuyers, construction of multifamily housing, and rehabilitation of existing single- and multi-family housing.

HOME serves income-qualified households of low to moderate income (at or below 80% of Area Median Income) through housing activities. This assistance provides funding for down payment and closing cost assistance for first time homebuyers, acquisition and/or rehabilitation of existing multi-family rental units, new construction of multifamily or single family housing in partnership with local governments who work with CHDOs and various non-profit organizations. Rent for tenants of HOME-assisted multi-family rentals is calculated using fair market rent of existing housing for comparable units in the area or rent that does not exceed 30 percent of the adjusted income

of a family whose annual income equals 65 percent of the median income for the area, as determined by HUD, with adjustments for number of bedrooms in the unit.

The Low Income Housing Tax Credit Program [Now referred to in Montana as the Housing Tax Credit (HTC)] provides funding for multifamily housing development. The housing tax credit is available under Section 42 of the Internal Revenue Code (IRC) of 1986 and is overseen by the Montana Board of Housing (MBOH). Properties assisted with HTC funds must meet the MBOH affordability compliance period, consisting of the initial 15 year compliance period, plus at least an additional 15 years. The credit is a federal income tax credit for owners of qualifying rental housing which meets low income occupancy and rent limitation requirements. Household income limitations are determined based on the area's median gross income (AMGI) as determined by HUD. Depending upon the IRS election of a minimum set-aside, the buildings constructed with HTC assistance must have either a) at least 20% of the total units in the property must be rent restricted and occupied by eligible tenants at or below 50% of AMGI, or b) at least 40% of the total units in the property must be rent restricted and occupied by eligible tenants at or below 60% of AMGI.

Section 8 provides assistance to qualified renters by way of a Housing Choice Voucher which may be used in a qualified property designated as a Project-based Section 8 Housing or they may find their own housing, in which case, the renter, after receiving a voucher, pays 30% of their adjusted gross income as rent and the balance is paid by the Section 8 program.

Veterans Affairs Supportive Housing (VASH) Program combines Housing Choice Voucher rental assistance for homeless veterans with case management and clinical services provided by the Department of Veterans Affairs. Veterans must be VA health care eligible Veterans and must meet the McKinney Act definition of homelessness to be eligible for the program. VA eligibility makes this determination.

The **Section 811 Program** subsidizes rental housing with supportive services for very low- and extremely low- income adults with disabilities, allowing persons with disabilities to live as independently as possible in the community. Section 811 provides project rental assistance to state housing agencies, which can be applied to new or existing multifamily housing complexes funded through different sources, such as Federal Low-Income Housing Tax Credits, Federal HOME funds, and other state, Federal, and local programs. At the time of admission, at least one person in a household considered for a unit receiving 811 PRA rental subsidies must be non-elderly (18-61 years of age), disabled, and receiving or be eligible to receive Medicaid and services and supports provided through DPHHS. Individuals must have extremely low incomes at or below 30% AMI, and be in the DPHHS caseload.

Shelter Plus provides rental assistance for homeless people with disabilities, primarily those with serious mental illness, chronic problems with alcohol and/or drugs, and acquired immunodeficiency syndrome (AIDS), and related diseases. Rental assistance grants must be matched in the aggregate by supportive services that are equal in value to the amount of rental assistance and appropriate to the needs of the population to be served. Rental assistance is provided through:

- Tenant-based Rental Assistance (TRA) to homeless persons who choose the housing in which they reside. Residents retain the assistance if they move; and the term for grants is 5 years;
- Sponsor-based Rental Assistance (SRA) provides rental assistance through contracts between the grant recipient and a private nonprofit sponsor or community mental health agency established as a public nonprofit entity that owns or leases dwelling units in which participants reside. The term for grants is 5 years;
- Project-based Rental Assistance (PRA) provides rental assistance to the owner of an existing structure where the owner agrees to lease the units to homeless people. Residents do not take the assistance with them if they

move. PRA grants are also for 5 years of assistance, but an owner may get 10 years of assistance if the owner rehabilitates the property; and

- Section 8 Moderate Rehabilitation for Single Room Occupancy (SRO) Dwellings provides grants for rental assistance. Assistance is provided for 10 years.

Emergency Solutions Grant and Rapid Re-Housing assists homeless households move as quickly as possible into permanent housing and achieve stability in that housing. Homelessness prevention services are available to at-risk individuals. Individuals or families at or below 30% of AMI who lack a stable and adequate nighttime residence may be eligible, particularly if they do not have sufficient resources or support to prevent them from moving to an emergency shelter.

The Native American Housing Assistance and Self-Determination Act Program provides federal funds directly from the Indian Housing Block grant to Montana tribes to use for income-eligible tribal member households. Income eligibility is calculated according to a process set by HUD. Uses of the funds are determined by the Tribe in coordination with the Indian Housing Block grant program.

The **United States Department of Agriculture Rural Development (USDA-RD)** offers a variety of programs to build or improve housing in rural areas, provide direct loans or loan guarantees to help low- and moderate-income rural Americans buy safe, affordable housing in rural areas. USDA also offers loans and grants to help rural residents make health and safety repairs to homes. USDA's Multi-Family Housing Programs offer loans to provide affordable rental housing for very low, low and moderate income residents, the elderly, and persons with disabilities, as well as rental assistance to help eligible rural residents with their monthly rental costs.

The **Montana Veterans Home Loan Program** provides first mortgage funds to Montana residents who are serving or have served in the military through the federal armed services and the Montana National Guard.

The **Score Advantage Down Payment Assistance** (DPA) Program was established to help borrowers who are eligible for Montana Board of Housing (MBOH) financing, but who lack funds for down payment and closing costs. Montana Board of Housing provides up to $6,500 towards DPA in combination with funds for 30-year FHA, VA, Rural Development or HUD-184 loans.

Habitat for Humanity has a number of locally run affiliates of Habitat for Humanity International, a nonprofit, housing organization. Habitat for Humanity works in partnership with qualified families to build and renovate decent, affordable housing. The houses then are sold to the families at no profit and with no interest charged.

Volunteers provide most of the labor, and individual and corporate donors provide money and materials to build Habitat houses. Partner families themselves invest hundreds of hours of labor – "sweat equity" – into building their homes and the homes of others. Their mortgage payments go into a revolving Fund for Humanity that is used to build more houses.

In addition, there are a number of **Montana Community Action Agency** programs and local non-profits that may be able to help residents facing a short-term crisis and may provide assistance to help households obtain funds for paying rent.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

According to the National Housing Trust estimates (from an analysis of HUD data through the end of 2004) there are 27 elderly Section 8 Properties, representing 1,882 units that are at-risk. HUD, on its 2015 list of expiring

Project Assistance contracts, includes one Montana property with 24 accessible, affordable one and two bedroom apartments for people with disabilities.

Does the availability of housing units meet the needs of the population?

In 2012, Commerce prepared a *White Paper on Housing in Montana* which has assisted in estimating housing unit needs across the state. The White Paper cites the Census Bureau and U.S. Department of Commerce while comparing population change percentages with percentage of change in the number of housing units from the year 2000 to 2010. As of May of 2012, nearly 30% of Section 8 vouchers were going unused because the voucher holders could not find rental units that fit the Section 8 housing quality and cost standards. Families in public housing are staying in their public housing units rather than waiting for a Section 8 voucher, because the quality of public housing is better than affordable units in the rental market. The rate at which people are able to leave public housing is down, creating less opportunity for people on the waiting list to obtain housing. Given the current rate of turnover and the length of the waiting list, a low income household needing public housing in Great Falls would have about a year wait before a unit would become available. There is an ongoing problem with affordability, in both the rent and the homebuyer markets.

Describe the need for specific types of housing.

In 2013, a count of the homeless population in the state showed that more than 1,878 persons were homeless in Montana. Local governments and private organizations continue to request funds to provide housing for the homeless or those at risk of becoming homeless as well as the need for housing with supportive services or temporary, transitional housing. Montana has high demand for rental housing demonstrated by the 3.7 percent vacancy rate indicated in the *2014 Rental Vacancy Survey*. Increasing cost burden, low vacancy rates, and increased competition for available units underscore the need for more affordable rental and homeownership developments across the state. In particular, many local organizations providing affordable rental or temporary housing low to moderate income households or clientele with special needs have long waiting lists.

Montana will promote equitable, affordable housing by expanding location and energy efficient housing choices for people of all ages, incomes, races, and ethnicities to increase mobility and lower the cost of housing. Also, Montana will 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.

In 2000, the Census Bureau reported that Montana had 421,633 total housing units. Since that time, the Census Bureau has continued to release estimates of the total number of housing units in the state. The annual estimates of housing stock are presented in Table MA-10.A. By 2013, there were estimated to be 485,771 housing units in Montana. Housing units were added at a continuous pace through the first decade, but have dropped under 1,000 per year since 2011.

Table MA-10.A- Housing Units Estimates

Year	*Housing Units*
2000	412,633
2001	420,436
2002	426,357
2003	433,250
2004	440,393
2005	449,791
2006	458,002

2007	465,868
2008	473,401
2009	479,025
2010	482,825
2011	484,148
2012	484,809
2013	485,771
Data Source: Census Data 2000-2013	

Type and Tenure

Single-family homes, mobile homes, and apartments together accounted for over 91 percent of Montana's housing stock in 2000 and 2012. However, though this overall proportion did not change considerably between the two years, there were some minor changes in the composition of Montana housing stock. The share of housing units accounted for by mobile homes fell by over two percentage points and the share of single-family homes grew by nearly three percentage points. By 2012, 72.1 percent of all housing units in the state were single-family homes, 11.3 percent were mobile homes, and 8.3 percent were apartment units. Table MA-10.B provides additional details of housing units by type.

Table MA-10.B- Housing Units by Type

Unit Type	***2000 Census***		***2012 Five-Year ACS***	
	Units	***% of Total***	***Units***	***% of Total***
Single-Family	287,477	69.7%	346,912	72.1%
Duplex	13,770	3.3%	17,116	3.6%
Tri-of-Four-Plex	19,006	4.6%	22,601	4.7%
Apartment	32,142	7.8%	40,001	8.3%
Mobile Home	58,957	14.3%	54,345	11.3%
Boat, RV, Van, Etc	1,281	0.3%	426	0.1%
Total	412,633	100.0%	481,401	100.0%
Data Source: 2000 Census SF3 & 2012 Five-Year ACS Data				

To further explain the types of properties in Montana Table MA-10.C breaks down the structure types of all housing. The majority of housing in Montana are 1-Unit detached structures being 69% of all structures. The smallest percentage of property structure types are structures with more than 20 units at 3%.

Table MA-10.C- Property Structure Types

Property Type	***Number***	***Percent***
1-Unit detached structure	326,537	69
1-Unit attached structure	12,708	3
2-4 units	37,070	8
5-19 units	25,357	5
More than 20 units	14,537	3
Mobile Home, boat, RV, van, etc.	55,514	12
Total	471,723	100
Data Source: 2000 Census SF3 & 2012 Five-Year ACS Data		

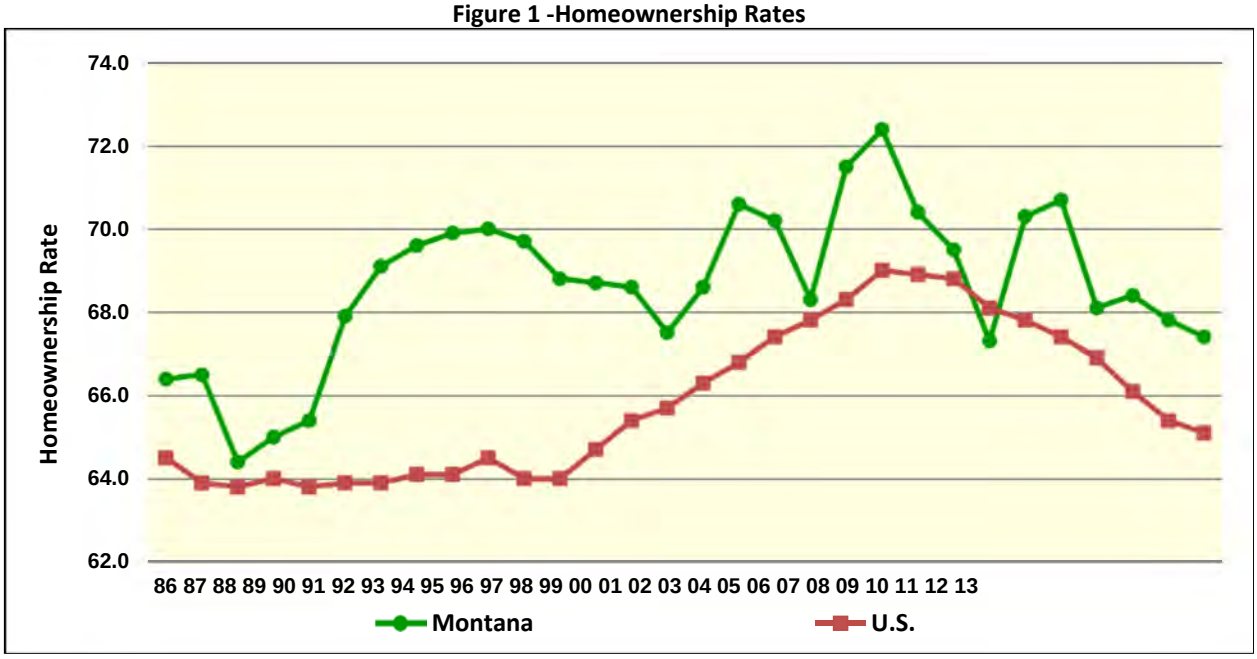
Over 70,000 housing units were added to the Montana housing market between the 2000 and 2010 Censuses, as seen in Table MA-10.D. Within occupied housing units, the proportion of renter-occupied units grew and the proportion of owner-occupied declined between 2000 and 2010. The number of vacant housing units also increased by 35.7 percent.

Table MA-10.D- Housing Units by Tenure

Occupied Housing Units	358,667	86.9%	409,607	84.8%	14.2%
Owner-Occupied	247,723	69.1%	278,418	68.0%	12.4%
Renter-Occupied	110,944	30.9%	131,189	32%	18.2%
Vacant Housing Units	53,966	13.1%	73,218	15.2%	35.7%
Total Housing Units	412,633	100.0%	482,825	100.0%	17.01%
Data Source: 2000 & 2010 Census SF1 Data					

The Census Bureau estimates homeownership rates annually. These data on homeownership rates are presented in Figure 1. This figure compares homeownership rates for Montana and the U.S. from 1986 through 2013 and shows that Montana had consistently higher homeownership rates, with the exception of 2008 and 2009, over this time as compared to national figures. While homeownership rates are lower in Montana in more recent years than in the mid-1990s and early 2000s, they are still higher than they were in the 1980s.

Figure 1 -Homeownership Rates



Data Source: Census Data, 1984 - 2014

Montana Assessor Data

The following section will explore 2012 Assessor data for the state of Montana as drawn by the Montana Department of Revenue (DOR) in order to evaluate the condition of housing units throughout the state. According to the 2010 Census, there were 482,825 housing units in the state of Montana. The assessor data explored in this section includes 404,726 residential property class dwellings and 61,513 residential units in commercial buildings such as apartments, together equating to 466,239 housing units. The assessor data is not likely to include housing located on Montana's Tribal Reservation or Reservation Trust Lands, which according to the 2010 Census included 28,220 units. When Tribal housing is included, the total comprises some 494,459 housing units in 2012. Consequently, the assessor data is comparable in number to the actual Census count of housing units in Montana in 2010.

Data presented includes information on structure types, foundations, number of bedrooms, year built, and other characterizing information. It also includes information on the quality of materials and workmanship used in the original construction of the dwellings as demonstrated by grade. This information combines to comprise a holistic look at Montana's housing stock, enabling the state to identify rehabilitation and redevelopment opportunities.

Residential Property Class Dwellings

The following section presents information about the residential property class, including housing characteristics and conditions of the dwellings. According to Montana assessor data, there are a total of 404,726 residential dwelling units in Montana as of 2012. Table MA-10.E shows the residential units by year built. Over 31 percent of all units were built before 1960, with single-family units comprising 98.7 percent of these older units. Additionally, the data shows that there are 234,615 units built before 1980.

Table MA-10.E- Residential Dwellings - Construction Era/Year

Year Built	*Condominium /Townhouse*	*Mobile Home*	*Single Family*	*Total*
1959 and Earlier	533	1,096	127,827	129,456
1960-1969	1,463	6,992	25,329	33,784
1970-1979	2,716	26,394	42,265	71,375
1980-1989	3,176	10,172	27,348	40,696
1990-1999	4,386	13,959	38,199	56,544
2000-2009	9,877	7,932	48,695	66,504
2010	348	305	2,740	3,393
2011	237	295	2,358	2,890
2012	0	84	0	84
Total	22,736	67,229	314,761	404,726
Data Source: MT DOR 2012				

Table MA-10.F shows the residential dwellings by number of bedrooms and construction year. Older homes, particularly those built prior to 1960 tended to have more bedrooms, as seen by the fact that 31.5 percent of 6 or more bedroom dwellings were built before 1960. The data indicates that three bedroom dwellings are the most common for all residential dwellings in Montana, accounting for 44.3 percent of all dwellings. Residential dwellings built in the 1990s and 2000s tended to have three bedrooms, accounting for over half of all dwellings built during those two decades.

Table MA-10.F- Residential Dwellings - Number of Bedrooms by Construction Era/Year

Year Built	*None/ Studio*	*1 Bdrms*	*2 Bdrms*	*3 Bdrms*	*4 Bdrms*	*5 Bdrms*	*6+ Bdrms*	*Total*
1959 and Earlier	1,636	14,709	45,518	42,592	18,923	4,776	1,302	129,456
1960-1969	449	1,880	9,905	13,501	5,823	1,845	381	33,784
1970-1979	548	2,382	20,853	33,433	10,526	3,019	614	71,375
1980-1989	373	1,929	10,408	20,403	5,975	1,303	305	40,696
1990-1999	519	2,594	10,379	31,049	9,079	2,368	556	56,544
2000-2009	869	3,792	11,346	35,093	11,176	3,337	891	66,504
2010	83	245	659	1,741	471	153	41	3,393
2011	126	215	497	1,474	396	144	38	2,890
2012	0	0	15	58	11	0	0	84
Total	4,603	27,746	109,580	179,344	62,380	16,945	4,128	404,726
Data Source: MT DOR 2012								

Table MA-10.G confirms that the three-bedroom units are the most common for owner-occupied units, while two-bedroom units are the most common for renter-occupied units.

Table MA-10.G- Unit Size by Tenure

Bedrooms	Owners		Renters	
	Number	%	Number	%
No Bedrooms	646	0	5,092	4
1-Bedroom	9,128	3	26,935	22
2-Bedroom	61,638	22	49,631	40
3+ Bedrooms	205,611	74	42,647	34
Total	277,023	99	124,305	100
Data Source: MT DOR 2012				

Residential dwellings are presented by the number of full bathrooms and construction year. Table MA-10.H illustrates that most residential dwellings have one or two full bathrooms, accounting for 43.7 and 43.0 percent of dwellings, respectively. Newer dwellings, particularly those built after 1980, tended to have two bathrooms over one, as evidenced by the fact that 64.2 percent of dwellings built in the 1990's and 62.7 percent of dwellings built in the 2000's have two full bathrooms. Conversely, older dwellings tended to have fewer bathrooms, with 68.1 percent of dwellings built prior to 1960 having only one full bathroom.

Table MA-10.H- Residential Dwellings - Number of Full Bathrooms by Construction Era/Year

Year Built	None	1 Bath	2 Bath	3 Bath	4 Bath	5 Bath	6+ Baths	Total
1959 and Earlier	5,788	88,104	31,922	3,199	352	54	37	129,456
1960-1969	1,070	19,770	11,077	1,749	105	10	3	33,784
1970-1979	1,422	36,294	28,047	5,262	294	38	18	71,375
1980-1989	991	14,366	21,010	3,906	337	58	28	40,696
1990-1999	1,025	8,897	36,239	9,249	909	152	73	56,544
2000-2009	1,187	8,332	41,701	12,687	1,929	433	235	66,504
2010	127	555	2,079	520	79	22	11	3,393
2011	170	431	1,754	446	60	12	17	2,890
2012	1	7	74	2	0	0	0	84
TOTAL	11,781	176,756	173,903	37,020	4,065	779	422	404,726
Data Source: MT DOR 2012								

Similarly, Table MA-10.I presents the number of half bathrooms for each dwelling by construction year. Some 79.6 percent of units have no half bathrooms and 19.6 percent of dwellings have one half bathroom.

Table MA-10.I- Residential Dwellings - Number of Half Bathrooms by Construction Era / Year

Year Built	None	1 Bath	2 Bath	3 Bath	4 Bath	5 Bath	6+ Baths	Total
1959 and Earlier	112,676	16,303	451	21	2	3	0	129,456
1960-1969	26,457	7,071	250	6	0	0	0	33,784
1970-1979	54,035	16,749	554	32	1	2	2	71,375
1980-1989	31,285	9,057	331	17	2	2	2	40,696
1990-1999	44,477	11,536	459	54	8	2	8	56,544
2000-2009	48,206	17,308	859	91	20	11	9	66,504
2010	2,602	745	44	2	0	0	0	3,393
2011	2,233	616	35	4	1	1	0	2,890
2012	81	2	1	0	0	0	0	84
Total	322,052	79,387	2,984	227	34	21	21	404,726
Data Source: MT DOR 2012								

Table MA-10.J demonstrates the total square footage of residential dwellings by construction year and includes basements, first, second, and additional floors, attics and unfinished areas. Most dwellings in Montana, as demonstrated by the data below, are between 1,001 and 2,000 square feet. The data shows that a majority of units with 1,000 square feet or less were built before 1980, with those dwellings accounting for 76.5 percent of

dwellings under 1,000 square feet. Dwellings with 3,000 to 5,000 square feet were most prominent in the 2000s, with dwellings built in the 2000s accounting for 31.3 percent of dwellings with that square footage.

Table MA-10.J Residential Dwellings - Total Square Feet by Construction Era

Year Built	*1,000 or Less*	*1,001-2000*	*2,001-3000*	*3,001-4000*	*4,001-5000*	*Over 5,000*	*Total*
1959 and Earlier	30,694	60,227	31,695	5,362	1,073	405	129,456
1960-1969	9,144	9,509	12,138	2,457	419	117	33,784
1970-1979	22,600	20,863	20,726	5,722	1,138	326	71,375
1980-1989	7,449	16,856	10,820	4,048	1,074	449	40,696
1990-1999	5,322	24,852	14,499	8,058	2,533	1,280	56,544
2000-2009	5,624	25,933	17,168	10,775	4,414	2,590	66,504
2010	411	1,347	782	520	202	131	3,393
2011	348	1,095	662	498	183	104	2,890
2012	12	61	4	5	2	0	84
Total	81,604	160,743	108,494	37,445	11,038	5,402	404,726
Includes basement, first, second, additional floors, half, attic and unfinished area footage.							
Data Source: MT DOR 2012							

Table MA-10.K shows the heated area of residential dwelling by construction date. Much of the data for these residential dwellings is not available. However, of the data that is presented, most dwellings have between 1,001 and 2,000 square feet of heated area.

Table MA-10.K- Residential Dwellings - Heated Area by Construction Era

Year Built	*1,000 or Less*	*1,001-2000*	*2,001-3000*	*3,001-4000*	*4,001-5000*	*Over 5,000*	*Data Not Available*	*Total*
1959 and Earlier	13,849	18,668	2,650	463	94	50	93,682	129,456
1960-1969	3,232	7,011	1,294	217	37	6	21,987	33,784
1970-1979	5,729	12,363	3,712	672	140	53	48,706	71,375
1980-1989	2,016	7,508	2,752	709	181	74	27,456	40,696
1990-1999	882	7,711	3,551	1,461	477	352	42,110	56,544
2000-2009	898	5,376	3,105	1,651	739	629	54,106	66,504
2010	46	219	108	51	23	17	2,929	3,393
2011	26	174	59	37	14	17	2,563	2,890
2012	7	36	2				39	84
Total	26,685	59,066	17,233	5,261	1705	1,198	293,578	404,726
Data Source: MT DOR 2012								

Table MA-10.L presents residential dwellings' condition, desirability, and usefulness (CDU) by structure type. CDU is defined by the Montana Appraisal Manual as a composite rating of the overall condition, desirability, and usefulness of a structure. Most residential dwellings were rated as fair or above, accounting for 92.42 percent of all dwellings. Mobile homes were more susceptible for low ratings of unsound, very poor or poor, with mobile homes accounting for 34.4 percent of dwellings with these three ratings, while comprising only 16.6 percent of all dwellings in this data.

Table MA-10.L - Residential Dwellings – Condition (CDU) by Structure Type

Condition (CDU)	*Condominium / Townhouse*	*Mobile Home*	*Single Family*	*Total*	*Percent of Total*
Unsound	1	1,658	3,252	4,911	1.21%
Very Poor	355	1,725	4,715	6,795	1.68%
Poor	719	7,167	11,104	18,990	4.69%
Fair	578	18,177	36,205	54,960	13.58%
Average	4,855	27,622	116,401	148,878	36.78%
Good	8,819	9,283	101,072	119,174	29.45%
Very Good	4,523	1,423	33,467	39,413	9.74%

Excellent	2,886	174	8,545	11,605	2.87%
Total	22,736	67,229	314,761	404,726	100.00%
Data Source: MT DOR 2012					

Table MA-10.M presents data on residential dwellings by building style and structure type. 59.4 percent of single family dwellings were classified as conventional, followed by 29.1 percent of single family dwellings classified as Ranch.

Table MA-10.M- Residential Dwellings - Building Style by Structure Type

Building Style	*Condominium/ Townhouse*	*Mobile Home*	*Single Family*	*Total*
A-Frame			736	736
Bi-Level			13,773	13,773
Bungalow			6,853	6,853
Condominium	22,886			22,886
Conventional			127,484	127,484
Early American			668	668
Earth Shelter			401	401
Foursquare			659	659
Log			19,780	19,780
Mobile Home		67,257		67257
Modern			3,823	3,823
Old Style			31,658	31,658
Other			4,016	4,016
Ranch			91,690	91,690
Shotgun			360	360
Split Level			11,194	11,194
Traditional			1,488	1,488
Total	22,886	67,257	314,583	404,726
Data Source: MT DOR 2012				

Table MA-10.N shows the foundation type by year built of residential dwellings. Some 81.2 percent of dwellings had a concrete foundation. The next most common foundation type was Pier, with 8.4 percent of dwellings. There were 28,875 dwellings that were classified as having no foundation.

Table MA-10.N- Residential Dwellings - Year Built by Foundation Type

Year Built	*Block*	*Concrete*	*None*	*Other*	*Pier*	*Slab*	*Stone*	*Wood*	*Total*
1959 and Earlier	1,091	118,656	1,575	82	5,317	1,045	1,456	234	129,456
1960-1969	293	25,912	3,409	10	3,755	350	24	31	33,784
1970-1979	894	45,412	12,377	39	11,977	528	36	112	71,375
1980-1989	520	29,490	4,462	28	5,204	606	28	358	40,696
1990-1999	1,120	44,445	4,570	59	5,027	1,009	51	263	56,544
2000-2009	374	59,438	2,228	56	2,295	1,962	22	129	66,504
2010	48	2,834	133	4	147	221	0	6	3,393
2011	60	2,367	105	10	153	185	1	9	2,890
2012	33	13	16	1	20	0	0	1	84
Total	4,433	328,567	28,875	289	33,895	5,906	1,618	1,143	404,726
Data Source: MT DOR 2012									

A majority of dwellings without foundations were mobile homes, as seen in Table MA-10.O, and mobile homes were more likely to have no foundation than other foundation types. The most common foundation type for condominiums/townhouses and single family dwellings is concrete.

Table MA-10.O- Residential Dwellings - Foundation by Structure Type

Foundation Type	*Condominium / Townhouse*	*Mobile Home*	*Single Family*	*Total*
Block	22	1,881	2,530	4,433
Concrete	21,802	14,285	292,480	328,567
None	134	27,048	1,693	28,875
Other	0	125	164	289
Pier	13	23,357	10,525	33,895
Slab	746	409	4,751	5,906
Stone	4	7	1,607	1,618
Wood	15	117	1,011	1,143
Total	22,736	67,229	314,761	404,726
Data Source: MT DOR 2012				

Data was also collected regarding the presence of a basement. This data is presented in Table MA-10.P, by structure type. The data showed that 40.2 percent of dwellings have a full basement, with single family homes accounting for 94.6 percent of dwellings with full basements. It was most common to have no basement, with 45.8 percent of dwellings having none. Over half of condominiums/townhouses had no basement, and more than nine out of ten mobile homes had no basement.

Table MA-10.P– Residential Dwellings - Presence of Basement by Structure Type

Basement Type	*Condominium / Townhouse*	*Mobile Home*	*Single Family*	*Total*
None	12,661	62,563	110,224	185,448
Crawl Space	2,998	2,266	17,635	22,899
Partial	464	270	32,762	33,496
Full	6,613	2,130	154,140	162,883
Total	22,736	67,229	314,761	404,726
Data Source: MT DOR 2012				

Table MA-10.Q presents data regarding exterior wall construction by structure type. The data indicates that 91.2 percent of single-family dwellings, and 94.8 percent of condominiums/townhouses had frame exterior wall construction. The next most common exterior wall construction for single-family dwellings was log, and for condominiums/townhouses is masonry.

Table MA-10.Q - Residential Dwellings - Exterior Wall Construction by Structure Type

Exterior Wall Construction	*Condominium / Townhouse*	*Mobile Home*	*Single Family*	*Total*
Frame	21,543	0	287,138	308,681
Frame & Masonry	537	0	3,589	4,126
Log	112	0	21,018	21,130
Masonry	544	0	3,016	3,560
Mobile Home	0	67,229	0	67,229
Total	22,736	67,229	314,761	404,726
Data Source: MT DOR 2012				

Table MA-10.R depicts residential dwelling grade by structure type. Cheap and poor grades only represent 2.16 percent of the total dwellings in this data, and single family dwellings account for all of the dwellings with these two grades. Low-cost and fair grades comprise 34.1 percent of dwellings, and single-family dwellings comprise 75.9 percent of dwellings with those grades. Mobile homes comprise 23.4 percent of dwellings with low-cost or fair

grades, while comprising only 16.6 percent of the total dwelling units. Condominiums/townhouses were most likely to have an average grade, with 56.0 percent of condominiums/townhouses having an average grade.

Table MA-10.R - Residential Dwellings - Grade by Structure Type

Grade	*Condominium / Townhouse*	*Mobile Home*	*Single Family*	*Total*	*Percent of Total*
Cheap	0	0	2,037	2,037	0.50%
Poor	0	0	6,726	6,726	1.66%
Low Cost	34	31,354	26,088	57,476	14.20%
Fair	1,061	873	78,601	80,535	19.90%
Average	12,737	23,135	148,513	184,385	45.56%
Good	5930	11225	39878	57033	14.09%
Very Good	1817	204	9868	11889	2.94%
Excellent	913	433	2,099	3,445	0.85%
Superior	147	5	768	920	0.23%
Extraordinary	97	0	183	280	0.07%
Total	22,736	67,229	314,761	404,726	100.0%
Data Source: MT DOR 2012					

Table MA-10.S continues the discussion on grade, but by year built. According to this data, dwellings built before 1960 were most likely to have a fair or average grade, with 77.1 percent of dwellings built prior to 1960 within these grades. Dwellings built since 1980 are most likely to have average or good ratings, with 78.4 percent of dwelling built after 1980 having an average or good grade.

Table MA-10.S - Residential Dwellings - Year Built by Grade

Year Built	*Cheap*	*Poor*	*Low Cost*	*Fair*	*Average*	*Good*	*Very Good*	*Excellent*	*Superior*	*Extra-ordinary*	*Total*
1959 and Earlier	1,229	4,338	20,725	53,910	45,226	3,491	440	86	9	2	129,456
1960-1969	122	475	7,654	5,247	18,397	1,705	169	15	0	0	33,784
1970-1979	184	527	22,246	8,523	33,626	5,632	573	59	4	1	71,375
1980-1989	198	547	4,090	5,184	22,612	6,691	1,140	210	20	4	40,696
1990-1999	158	471	1,502	4,062	29,573	16,414	3,160	1,021	165	18	56,544
2000-2009	127	317	1129	3209	31605	21260	5991	1948	678	240	66504
2010	9	34	74	199	1802	960	223	58	27	7	3393
2,011	10	17	54	200	1,488	857	192	47	17	8	2,890
2,012	0	0	2	1	56	23	1	1	0	0	84
Total	2,037	6,726	57,476	80,535	184,385	57,033	11,889	3,445	920	280	404,726
Data Source: MT DOR 2012											

As seen in Table MA-10.T wood siding/sheathing is the most common exterior wall construction for all dwellings, as well as being the most common for single-family dwellings and condominiums/townhouses. The second most common exterior wall construction for both single-family dwellings and condominiums/townhouses was masonite. The most common exterior wall construction for mobile homes was aluminum/vinyl, followed by wood siding/sheathing.

Table MA-10.T- Residential Dwellings - Exterior Wall Construction by Structure Type

Exterior Wall Construction	*Condominium / Townhouse*	*Mobile Home*	*Single Family*	*Total*
Asbestos	25	69	12,136	12,230
Aluminum / Vinyl	3,118	36,231	48,648	87,997
Block	168	10	908	1,086
Brick	795	6	6,092	6,893

Masonite	8,332	13,841	69,450	91,623
Other	476	832	24,826	26,133
Shingle	85	63	11,944	12,092
Stone	49	12	606	667
Stucco	822	52	12,507	13,381
Wood Siding/Sheathing	8,866	16,113	127,644	152,623
Total	22,736	67,229	314,761	404,726
Data Source: MT DOR 2012				

Roof material is shown in Table MA-10.U by structure type. Asphalt shingles were the most common roof material for all residential dwellings, accounting for 65.6 percent. This was also the most common roof material for single-family dwellings and condominiums/townhouses. The most common roof material for mobile homes and second most common for single-family dwellings was metal.

Table MA-10.U- Residential Dwellings - Roof Material by Structure Type

Roof Material	*Condominium/ Townhouse*	*Mobile Home*	*Single Family*	*Total*
Asbestos	5	223	1,272	1,500
Asphalt Shingles	18,244	28,840	218,501	265,585
Composition Roll	178	5,588	13,972	19,738
Copper	0	12	70	82
Metal	779	31,872	44,328	76,979
Other	350	87	695	1,132
Slate	7	9	252	268
Built up Tar & Gravel	837	330	3,865	5,032
Tile	78	23	1,092	1,193
Wood Shake	2,094	90	11,956	14,140
Wood Shingle	164	155	18,758	19,077
Total	22,736	67,229	314,761	404,726
Data Source: MT DOR 2012				

Table MA-10.V presents effective year by grade for residential dwellings. According to *the Montana Appraisal Manual*, the effective year is assigned to a structure based upon its condition as of the effective evaluation and may be greater or less than the structure's actual age. The highest number of dwellings with a grade of cheap or poor had an effective year of 1939 and earlier. The highest number of dwellings with a grade of average and above had an effective year of 2000-2009.

Table MA-10.V - Residential Dwellings - Effective Year by Grade

Effective Year	*Cheap*	*Poor*	*Low Cost*	*Fair*	*Average*	*Good*	*Very Good*	*Excellent*	*Superior*	*Extra-ordinary*	*Total*
1939 and Earlier	533	1,289	2,767	5,411	1,503	226	45	15	1	0	11,790
1940-1949	289	848	3,141	4,175	984	60	2	0	0	0	9,499
1950-1959	221	773	5,130	6,881	3,090	160	11	0	0	1	16,267
1960-1969	191	921	11,452	16,119	11,735	554	54	4	0	0	41,030
1970-1979	275	1,164	25,445	19,662	34,662	3,253	229	27	3	0	84,720
1980-1989	235	817	6,328	17,670	54276	8,532	946	164	3	2	88,973
1990-1999	157	546	1,891	6,676	40887	19,364	3,486	978	145	13	74,143
2000-2009	118	319	1,187	3,537	33,883	23,019	6,687	2,145	724	248	71,867
2010 or Later	18	49	135	404	3,365	1,865	429	112	44	16	6,437
Total	2,037	6,726	57,476	80,535	184,385	57,033	11,889	3,445	920	280	404,726
Data Source: MT DOR 2012											

Foundation type by effective year is shown in Table MA-10.W. Concrete foundations were the most likely foundation types for all effective years, and accounted for 81.2 percent of all foundation types. The second most common, pier foundations, were most common in dwellings with effective years between 1970-1979.

Table MA-10.W - Residential Dwellings - Effective Year by Foundation Type

Effective Year	*Block*	*Concrete*	*None*	*Other*	*Pier*	*Slab*	*Stone*	*Wood*	*Total*
1939 and Earlier	53	9,994	365	19	1,017	67	230	45	11,790
1940-1949	40	8,432	184	5	696	46	77	19	9,499
1950-1959	106	13,885	698	16	1,246	130	154	32	16,267
1960-1969	338	32,276	3,479	28	4,046	352	436	75	41,030
1970-1979	1,089	57,995	12,113	43	12,353	689	318	120	84,720
1980-1989	933	75,432	4,845	33	6293	868	249	320	88,973
1990-1999	1,282	60,873	4,673	71	5538	1,230	119	357	74,143
2000-2009	450	64,414	2,266	59	2,381	2,104	34	159	71,867
2010 or Later	142	5,266	253	15	324	420	1	16	6,437
Total	4,433	328,567	28,876	289	33,894	5,906	1,618	1,143	404,726
Data Source: MT DOR 2012									

Table MA-10.X presents data regarding residential dwelling structure type by effective year. The information provided shows dwellings with effective years prior to 1960 were overwhelmingly single family dwellings. Condominiums/townhouses with effective years in the 2000s were much more prevalent than preceding effective years. Mobile homes were most likely to have effective years in the 1970s, accounting for 38.0 percent of all mobile homes.

Table MA-10.X - Residential Dwellings – Effective Year by Structure Type

Effective Year	*Condominium / Townhouse*	*Mobile Home*	*Single Family*	*Total*
1939 and Earlier	26	0	11,764	11,790
1940-1949	6	15	9,478	9,499
1950-1959	2	1,045	15,220	16,267
1960-1969	1,114	6,596	33,320	41,030
1970-1979	1,029	25,576	58,115	84,720
1980-1989	4,114	11,036	73,823	88,973
1990-1999	5,211	14,154	54,778	74,143
2000-2009	10,639	8,120	53,108	71,867
2010 or Later	595	687	5,155	6,437
Total	22,736	67,229	314,761	404,726
Data Source: MT DOR 2012				

Table MA-10.Y presents CDU by grade. Looking at this data, dwellings that fall into the categories between cheap and low-cost, and between Unsound and poor, comprising 21,527 units and represent redevelopment opportunities rather than rehabilitation opportunities; these account for 5.3 percent of all dwellings. Dwellings that are rated between fair and good and between unsound and poor may be able to be renovated to meet current codes and standards. There are 9,213 dwellings in these categories, accounting for 2.3 percent of all the dwellings in this data set.

Table MA-10.Y - Residential Dwellings - Grade by Condition (CDU)

Grade	*Unsound*	*Very Poor*	*Poor*	*Fair*	*Average*	*Good*	*Very Good*	*Excellent*	*TOTAL*
Cheap	451	381	371	345	407	53	23	6	2,037
Poor	834	834	1,185	1,712	1,662	364	124	11	6,726
Low Cost	2,901	3,814	10,696	22,139	15,874	1,601	420	31	57,476
Fair	560	1,153	4,595	18,673	42,785	10,833	1,815	121	80,535
Average	152	588	2,049	11,272	76,057	77,217	15,495	1,555	184,385
Good	10	23	83	766	11,440	26,081	14,951	3,679	57,033
Very Good	3	2	8	38	466	2,641	5,309	3,422	11,889
Excellent	0	0	3	14	182	362	1,132	1,752	3,445

Superior	0	0	0	1	5	21	127	766	920
Extraordinary	0	0	0	0	0	1	17	262	280
Total	4,911	6,795	18,990	54,960	148,878	119,174	39,413	11,605	404,726
Data Source: MT DOR 2012									

MA-15 Cost of Housing

Introduction

Below is information regarding the costs of housing throughout the state.

Cost of Housing

Table 30 – Cost of Housing

	Base Year: 2000	*Most Recent Year: 2011*	*% Change*
Median Home Value	95,800	179,900	88%
Median Contract Rent	383	538	40%
Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)			

Table 31 - Rent Paid

Rent Paid	*Number*	*Percent*
Less than $500	61,577	49.0%
$500-999	54,797	43.6%
$1,000-1,499	6,853	5.5%
$1,500-1,999	1,284	1.0%
$2,000 or more	1,071	0.9%
Total	125,582	100.0%
Data Source: 2007-2011 ACS		

Housing Affordability

Table 32 – Housing Affordability

% Units affordable to Households earning	*Renter*	*Owner*
30% HAMFI	10,660	No Data
50% HAMFI	38,250	19,005
80% HAMFI	81,565	53,215
100% HAMFI	No Data	85,760
Total	130,475	157,980
Data Source: 2007-2011 ACS		

Based on the number of households earning 0-30% of the AMI there are not enough rental units in Montana affordable to households earning 30% HAMFI with only 20,285 available (as noted above. What this means is that a small percentage of persons at 30% of HAMFI can find units that are affordable. As incomes increase so does the availability of affordable units.

Monthly Rent

Table 35 was generated through the IDIS eCon Planning Suite System which did not provide any data as monthly rents vary throughout the state. Because this Consolidated Plan is for a State grantee no specific information will be available due to significant variations in rents throughout various counties and regions within Montana.

Table 33– Monthly Rent

Monthly Rent ($)	*Efficiency (no bedroom)*	*1 Bedroom*	*2 Bedroom*	*3 Bedroom*	*4 Bedroom*
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0
Data Source: HUD FMR and HOME Rents					

Is there sufficient housing for households at all income levels?

No. Since 2006, the average cost to rent an eligible subsidized housing unit has been increasing while the amount of dollars from HUD has been decreasing. As a result, the number of people that can be assisted by HUD programs in Montana has declined. The poverty rate in Montana has been increasing, with an estimated 146,257 people living at or below the poverty level in Montana in 2010. At an average household size of 2.35 in 2010, this translates into 62,237 households, well beyond the number of households that can be assisted with the available resources.

On the other end of the scale, the median home price in Missoula – one of the nation's least affordable cities, according to a City Lab analysis – is $235,000. While the basic rule of thumb is that an affordable home is 2.6 times a household annual take-home pay, a Missoula home priced at the median would cost 5.9 years' worth of wages, leaving great demand for affordable workforce housing.

How is affordability of housing likely to change considering changes to home values and/or rents?

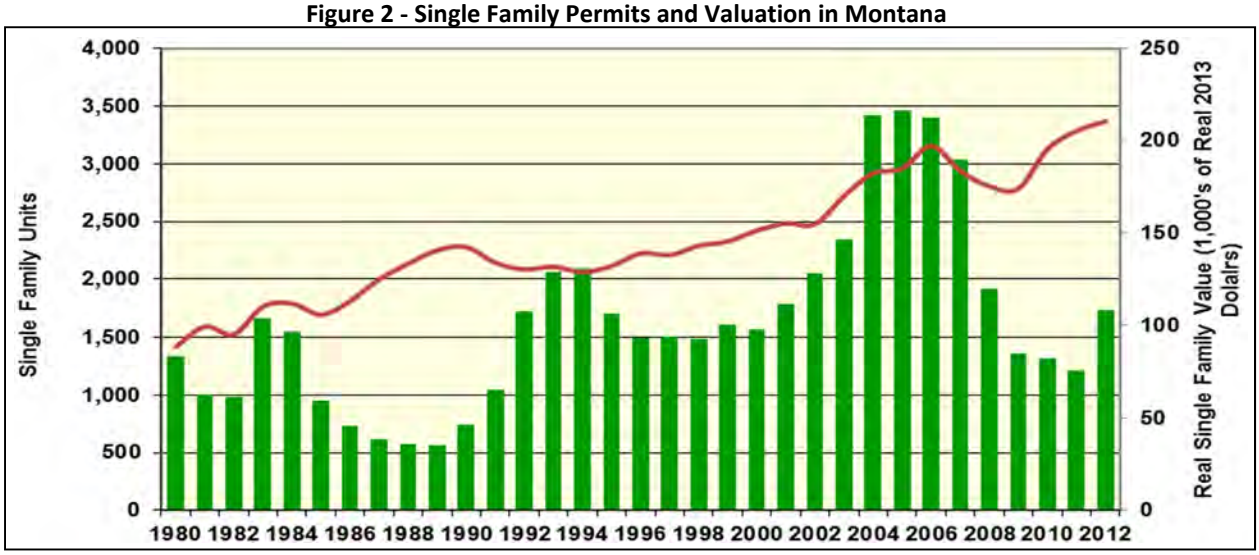
Ranked 48th in population density with a population just over one million residents living in a state covering more than 147,000 square miles, Montana has a wide range of home values and rents that fluctuate based on a range of local conditions. These conditions include, but are not limited to significant oil and gas development in the east, a struggling forest products industry in the west, and strong housing markets in some areas. These factors converge to decrease the affordability of housing as either home values and/or rents increase or incomes stagnate or even decline. In particular, affordability of housing for individuals with special needs and senior citizens is likely to decrease due to declining levels of assistance and fixed income as living costs increase.

How do HOME Rents/Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

According to Census (ACS 2013), Montana's median rent was $690, a comparable amount to Fair Market Rent, except in Montana's most urban cities of Missoula and Billings. Montana remains committed to assisting local counties and municipalities in finding ways to address the needs of low and moderate income households across Montana, including assisting with affordable, accessible rent where that need has been identified.

The Census Bureau also reports the value of construction appearing on a building permit, excluding the cost of land and related land development. As shown in Figure 2 the construction value of single-family dwellings generally increased from 1980 through 2012. After dropping in 2008, values started to rise again in the past few years. The distribution of housing values around the state of Montana as reported in the 2012 American Community Survey is presented below. This map shows that the areas with the highest home values were in and near urban areas surrounding Missoula, Butte and Bozeman. In these areas, home values generally ranged from $183,000 to $435,250. Home values were generally higher in the western portion of the state.

Figure 2 - Single Family Permits and Valuation in Montana



Data Source: U.S. Census Building Permit Data, Real 2013 Dollars

The median home value in Montana has increased since 2000. In 2000, the median home value was $95,800, but in 2011 that same home value has grown to $173,300. This is an increase of 81%. Table MA-15.A shows both the median home value and the median contract rent for the state of Montana.

Table MA-15.A - Cost of Housing

	Base Year 2000	*Most Recent Year 2011*	*Percent Change*
Median Home Value	$95,800	$173,300	81
Median Contract Rent	$383.00	$521.00	36
Data Source: 2000 Census, 2007-2011 ACS			

Table MA-15.B shows the number of households and their respective rent paid. Approximately 64,809 households paid rent of less than $500 a month. Less than 1% of households pay more than $2,000 or more a month.

Table MA-15.B- Amount of Rent Paid

Rent Paid	*Number*	*Percent*
Less Than $500	64,809	52.1
500-999	51,775	41.7
$1,000-1,499	5,717	4.6
$1,500-1,999	960	0.8
$2,000 or more	1,044	0.8
Total	124,305	100
Data Source: 2007-2011 ACS		

Maps 1 and 2, illustrate data on median gross rent prices by census tract derived from 2012 American Community Survey for the State of Montana. In this situation, gross rent refers to monthly contracted rental fees plus average monthly utility costs, which includes electricity, water and sewer services, and garbage removal. Some similarities can be seen when comparing this map and the previous map regarding home values. For example, the areas with the highest gross rent costs were in or near the major cities in the state and were concentrated in the western half of the state, The majority of the State, however, had average rents between $253 and $561 per month.

As seen in Table MA-15.C, the median rent in 2010 was $561, compared to median rent in 2000 at $447. The median home value in 2010 was $183,000, compared to the median home value in 2000 at $99,500.

Table MA-15.C - Median Housing Costs

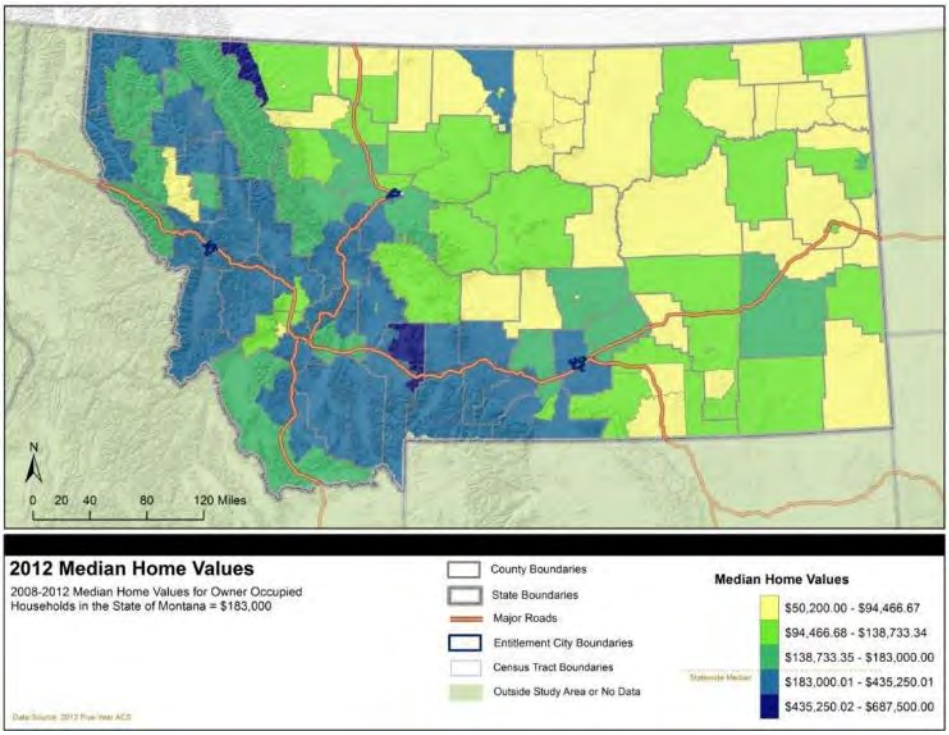
Housing Cost	*2000*	*2010*
Median Contract Rent	$447	$561
Median Home Value	$99,500	$183,000
Data Source: 2000 Census SF3 & 2012 Five-Year ACS Data		

Table MA-15.D shows the average market rental rates for the state of Montana. The average rental rate for an efficiency is $510.00, while the average rent for a one-bedroom is $561.60. The total average rent for the state of Montana is $777.20.

Table MA-15.D- Average Market Rental Rates

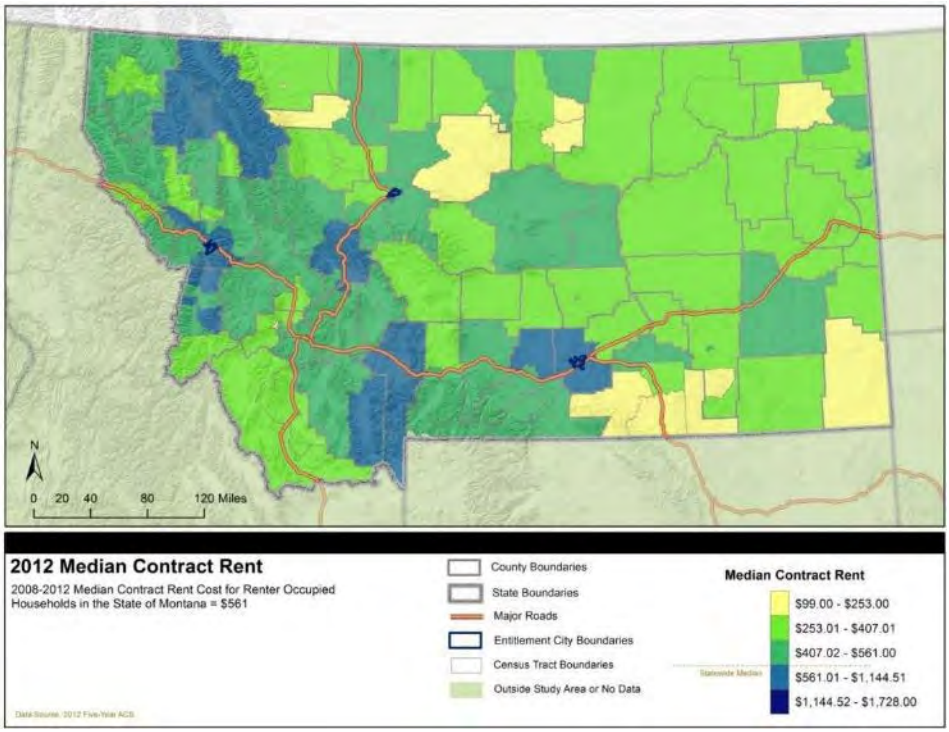
Number of Bedrooms	*Single Family*	*Apartment*	*Mobile Homes*	*"Other"*	*Average Market Rents*
Efficiency	$ 431.30	$ 517.10	$	$	$ 510.00
One	537.00	574.60	400.00	475.00	561.60
Two	726.40	693.00	527.40	636.60	690.50
Three	964.10	901.70	673.30	810.50	905.30
Four	1,350.80	1,255.60	$	1,136.70	1,327.40
Total	$ 888.20	$ 694.2	$ 614.70	$ 732.30	$ 777.20
Data Source: 2014 Montana RVS Survey					

Map 1 - Median Home Value by Census Tract



Data Source: 2012 Five-Year ACS

Map 2 - Median Contract Rent by Census Tract



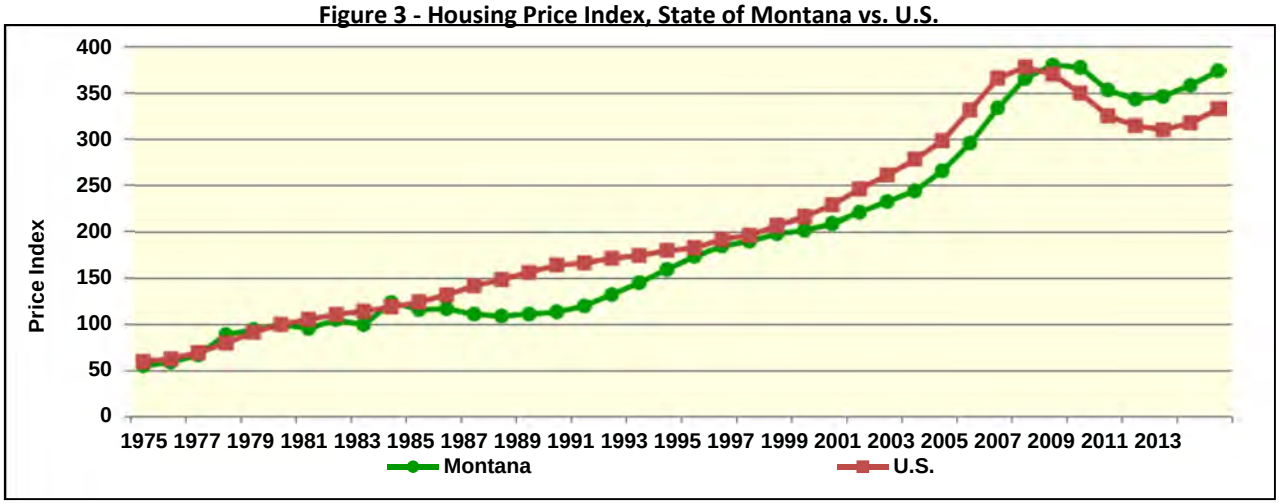
Data Source: 2012 Five-Year ACS

Another indicator of housing cost was provided by the Federal Housing Finance Agency (FHFA). The FHFA, the regulatory agency for Fannie Mae and Freddie Mac, tracks average housing price changes for single-family homes and publishes a Housing Price Index (HPI) reflecting price movements on a quarterly basis. This index is a weighted repeat sales index, meaning that it measures average price changes in repeat sales or refinancing on the same properties. This information was obtained by reviewing repeat mortgage transactions on single-family properties whose mortgages have been purchased or securitized by Fannie Mae or Freddie Mac since January 1975.[31] There are over 31 million repeat transactions in this database, which is computed monthly. All indexes, whether state or national, were set equal to 100 as of the first quarter of 2000.

Figure 3 shows the housing price index for one quarter from each year from 1975 through 2014. As seen therein, the Montana index has been lower than the U.S. index since the late 1980s, with a near convergence in the mid 1990's. The housing price index in Montana increased for the next ten years to twelve years, surpassing the national index in 2008. Although the state index fell during that time, it has remained higher than the national level and has begun to rise.

[31] Office of Federal Housing Enterprise Oversight, News Release, December 1, 2006.

Figure 3 - Housing Price Index, State of Montana vs. U.S.



Data Source: FHFA First Quarter Data, 1975 – 2014: 1980 1Q = 100

Table MA-15.E shows the housing affordability within the state of Montana. There are a total of 82,070 renter households at the 80% HUD Area Median Family Income (HAMFI) versus the 55,005 owner households at the same level.

Table MA-15.E - Housing Affordability

Percent of units affordable to Households		
Earning	***Renter***	***Owner***
30% HAMFI	11,305	No Data
50% HAMFI	40,040	18,770
80% HAMFI	82,070	55,005
100% HAMFI	No Data	85,550
Total	133,415	159,325
Data Source: HAMFI		

MA-20 Condition of Housing

Introduction

The condition of housing in the state of Montana has been examined in order to demonstrate the work that is needed over the next five years. For Owner-Occupied units, there are 68,747 households, or 25%, which have at least one housing condition. The vast majority of Owner-Occupied units, 207,030 households or 74%, have no selected conditions. For Renter-Occupied units, the balance is similar, with the majority of units (60%) being free of conditions, but 38% having at least one.

The age of the housing stock is also reported in the 2012 American Community Survey. The age of the housing stock has been grouped into nine categories, ranging from 1939 or earlier through 2005 or later. Table MA-20.A shows that substantial numbers of housing units were added to the stock in the 1970s, with those units accounting for 19.1 percent of the housing stock, and in the 1990s, with those units accounting for 14.6%.

Table MA-20.A - Households by Year Home Built

Year Built	*2000 Census*		*2012 Five-Year ACS*	
	Households	*% of Total*	*Households*	*% of Total*
1939 or Earlier	60,497	16.9%	59,305	14.6%
1940 to 1949	24,730	6.9%	23,270	5.7%
1950 to 1959	42,738	11.9%	41,735	10.3%
1960 to 1969	39,584	11.0%	35,568	8.8%
1970 to 1979	81,107	22.6%	77,547	19.1%
1980 to 1989	47,910	13.4%	48,212	11.9%
1990 to 1999	62,101	17.3%	59,330	14.6%
2000 to 2004	.	.	58,613	14.5%
2005 or Later	.	.	1,928	.5%
Total	358,667	100.0%	405,508	100.0%
Data Source: 2000 Census SF3 & 2012 Five-Year ACS Data				

Table MA-20.B shows the age of the housing stock in Montana from before 1950 through 2000. Between 1950 and 1979 107,146 Owner-Occupied houses were added to the housing stock in Montana. During that same timeframe 50,559 Renter-Occupied houses were added. The table also shows that there is more than double the amount of Owner-Occupied houses in Montana than Renter-Occupied.

Table MA-20.B- Age of the Housing Stock

Year Unit Built	*Owner-Occupied*		*Renter Occupied*	
	Number	*%*	*Number*	*%*
2000 or Later	35,321	13	13,091	11
1980-1999	79,642	29	29,778	24
1950-1979	107,146	39	50,559	41
Before 1950	54,914	20	30,877	25
Total	277,023	101	124,305	101
Data Source: 2007-2011 ACS				

Definitions

Under Section 104(d) of the Housing and Community Development Act of 1974, as amended, housing activities may be completed to replace 'occupied' and 'vacant but occupiable' low/moderate income dwelling units that are demolished or converted to a use other than as low/moderate income housing as a direct result of funded activities. Section 104(d) provides that dwelling units which meet the definition of "substandard housing unsuitable for rehabilitation", and which have been vacant for at least six months prior their conversion or demolition, are exempt from coverage under the plan. For purposes of this plan, Commerce will use the following definitions when considering funding.

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

1. Housing quality standards (HOS) set forth in the Section 8 Program for Housing Quality Standards (HOS)

2. All zoning ordinances and uniform codes adopted by the state, which are national or international codes

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

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

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

Condition of Units

Table 34 - Condition of Units

Condition of Units	*Owner-Occupied*		*Renter-Occupied*	
	Number	*%*	*Number*	*%*
With one selected Condition	68,747	25%	48,402	39%
With two selected Conditions	1,855	1%	2,708	2%
With three selected Conditions	278	0%	459	0%
With four selected Conditions	3	0%	11	0%
No selected Conditions	207,030	74%	74,002	59%
Total	277,913	100%	125,582	100%
Data Source: 2007-2011 ACS				

Year Unit Built

Table 35 – Year Unit Built

Year Unit Built	*Owner-Occupied*		*Renter-Occupied*	
	Number	*%*	*Number*	*%*
2000 or later	39,981	14%	14,792	12%
1980-1999	77,976	28%	29,622	24%
1950-1979	106,764	38%	50,176	40%
Before 1950	53,192	19%	30,992	25%
Total	277,913	99%	125,582	101%
Data Source: 2007-2011 ACS				

Risk of Lead-Based Paint Hazard

Table 36 – Risk of Lead-Based Paint

Risk of Lead-Based Paint Hazard	*Owner-Occupied*		*Renter-Occupied*	
	Number	*%*	*Number*	*%*
Total Number of Units Built Before 1980	159,956	58	81,168	65
Housing Units build before 1980 with children present	17,250	6	8,935	7
Data Source: 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)				

Lead-Based Paint Hazards

Older homes, particularly those built prior to 1978, have a greater likelihood of lead-based paint hazards than homes built after 1978, when lead as an ingredient in paint was banned. Indeed, environmental issues play an important role in the quality of housing. Exposure to lead-based paint, which is more likely to occur in these older homes, is one of the most significant environmental threats posed to homeowners and renters.

Medical understanding of the harmful effects of lead poisoning on children and adults in both the short- and long-term is increasing. Evidence shows that lead dust is a more serious hazard than ingestion of lead-based paint chips. Dust from surfaces with intact lead-based paint is pervasive and poisonous when inhaled or ingested. Making the situation more difficult is the fact that lead dust is so fine that it cannot be collected by conventional vacuum cleaners.

Lead-based paint was banned from residential use because of the health risk it posed, particularly to children. Homes built prior to 1980 have some chance of containing lead-based paint on interior or exterior surfaces. The chances increase with the age of the housing units. Information below shows the risk of lead-based paint exposure in owner- and renter-occupied houses. HUD has established estimates for determining the likelihood of housing units containing lead-based paint. These estimates are as follows:

- 90 percent of units built before 1940;
- 80 percent of units built from 1940 through 1959; and
- 62 percent of units built from 1960 through 1979.

Other factors used to determine the risk for lead-based paint problems include the condition of the housing unit, tenure and household income. Households with young children are also at greater risk because young children have more hand-to-mouth activity and absorb lead more readily than adults. The two factors most correlated with higher risks of lead-based paint hazards are residing in rental or lower-income households. Low-income residents are less likely to be able to afford proper maintenance of their homes, leading to issues such as chipped and peeling paint, and renters are not as likely or are not allowed to renovate their rental units.

Vacant Units

Table 37 - Vacant Units

	Suitable for Rehabilitation	*Not Suitable for Rehabilitation*	*Total*
Vacant Units	N/A	N/A	
Abandoned Vacant Units	N/A	N/A	
REO Properties	N/A	N/A	
Abandoned REO Properties	N/A	N/A	
Information for this table was not available.			

Need for Owner and Rental Rehabilitation

In Montana, there are 340,153 parcels with housing units on them (a 'parcel' could be a complex multifamily building). The ACS 5-year estimates report that Montana has 483,303 housing units. Of that number, according to the Montana Department of Revenue, 10% are in excellent condition; 32% are in good condition; 45% in average condition; 10% are substandard, and 4% significantly substandard. These last two categories (substandard, and significantly substandard) are candidates for potential rehabilitation and represent more than 67,600 houses across Montana. Clearly there is a need for rehabilitation to retain these houses as part of Montana's housing stock.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards.

According to the 2012 five year ACS data, 243,496 housing units built before 1980 are at risk of lead based paint hazards. Data shows owner occupied households faced a risk of lead-based paint at all income levels. Renter

occupied households had a higher rate of risk for lead-based paint, with lower income levels facing more lead- based paint risks as documented in Table 38.

National Efforts to Reduce Lead-Based Paint Hazards

In 1991 Congress formed HUD's Office of Healthy Homes and Lead Hazard Control to eradicate lead-based paint hazards in privately-owned and low-income housing in the U.S. One way it has done this is by providing grants for communities to address their own lead paint hazards. Other responsibilities of this office are enforcement of HUD's lead-based paint regulations, public outreach and technical assistance, and technical studies to help protect children and their families from health and safety hazards in the home.[32]

Then in 1992, to address the problem more directly, Congress passed the Residential Lead-Based Paint Hazard Reduction Act, also known as Title X, which developed a comprehensive federal strategy for reducing lead exposure from paint, dust and soil, and provided authority for several rules and regulations, including the following:

1. **Lead Safe Housing Rule** – mandates that federally-assisted or owned housing facilities notify residents about, evaluate, and reduce lead-based paint hazards.
2. **Lead Disclosure Rule** – requires homeowners to disclose all known lead-based paint hazards when selling or leasing a residential property built before 1978. Violations of the Lead Disclosure Rule may result in civil money penalties of up to $11,000 per violation.[33]
3. **Pre-Renovation Education Rule** – ensures that owners and occupants of most pre-1978 housing are given information about potential hazards of lead-based paint exposure before certain renovations happen on that unit.
4. **Lead Renovation, Repair and Painting Program Rule** – establishes standards for anyone engaging in target housing renovation that creates lead-based paint hazards.[34]

A ten-year goal was set in February 2000 by President Clinton's Task Force on Environmental Health Risks and Safety Risks to Children to eliminate childhood lead poisoning in the U.S. as a major public health issue by 2010. As a means to achieve this goal, they released the following four broad recommendations in their "Eliminating Childhood Lead Poisoning: A Federal Strategy Targeting Lead Paint Hazards," report:

1. **Prevent lead exposure in children** by, among other actions, increasing the availability of lead-safe dwellings through increased funding of HUD's lead hazard control program, controlling lead paint hazards, educating the public about lead-safe painting, renovation and maintenance work, and enforcing compliance with lead paint laws.
2. **Increase early intervention to identify and care for lead-poisoned children** through screening and follow-up services for at-risk children, especially Medicaid-eligible children, and increasing coordination between federal, state and local agencies who are responsible for lead hazard control, among other measures.
3. **Conduct research** to, for example, develop new lead hazard control technologies, improve prevention strategies, promote innovative ways to decrease lead hazard control costs, and quantify the ways in which children are exposed to lead.
4. **Measure progress and refine lead poisoning prevention strategies** by, for instance, implementing monitoring and surveillance programs.

[32] "About the Office of Healthy Homes and Lead Hazard Control." 21 February 2011. U.S. Department of Housing and Urban Development. 12 May 2014 <http://www.hud.gov/offices/lead/about.cfm>.
[33] "Lead Programs Enforcement Division - HUD." *Homes and Communities - U.S. Department of Housing and Urban Development (HUD)*. 12 May 2014 <http://www.hud.gov/offices/lead/enforcement/index.cfm>.
[34] "Lead: Rules and Regulations | Lead in Paint, Dust, and Soil | US EPA." *U.S. Environmental Protection Agency*. 31 Dec. 2008 <http://www.epa.gov/lead/pubs/regulation.htm>.

Continuing these efforts, the U.S. Department of Health and Human Services launched Healthy People 2020, which included the goal of eliminating childhood blood lead levels ≥10 µg/dL (micrograms per deciliter).[35] As part of the National Center for Environmental Health, the program works with other agencies to address the problem of unhealthy and unsafe housing through surveillance, research and comprehensive prevention programs.[36]

In 2010, the Environmental Protection Agency (EPA) enacted the Lead Renovation, Repair, and Painting Rule (RRP). This rule requires that any firms performing renovation, repair, and painting projects that disturb lead-based paint in homes, child care facilities and pre-schools built before 1978 must be certified by the EPA.[37]

Lead-Based Paint Hazards for Children

Children's exposure to lead has decreased dramatically over the past few decades due to federal mandates that lead be phased out of items such as gasoline, food and beverage cans, water pipes, and industrial emissions. However, despite a ban in 1978 on the use of lead in new paint, children living in older homes are still at risk from deteriorating lead-based paint and its resulting lead contaminated household dust and soil. Today lead-based paint in older housing remains one of the most common sources of lead exposure for children[38].

Thirty-eight million housing units in the United States had lead-based paint during a 1998 to 2000 survey, down from the 1990 estimate of 64 million. Still, 24 million housing units in the survey contained significant lead-based paint hazards. Of those with hazards, 1.2 million were homes to low-income families with children under 6 years of age.[39]

National Efforts to Reduce Lead Exposure in Children

There have been a number of substantive steps taken by the U.S. to reduce and eliminate blood lead poisoning in children. The Lead Contamination Control Act (LCCA) of 1988 authorized the Centers for Disease Control and Prevention (CDC) to make grants to state and local agencies for childhood lead poisoning prevention programs that develop prevention programs and policies, educate the public, and support research to determine the effectiveness of prevention efforts at federal, state, and local levels. The CDC has carried out these activities through its Childhood Lead Poisoning Prevention Program.[40] One of the most significant actions the CDC has taken to lower blood lead levels (BLLs) in children over the past few decades is their gradual changing of the definition of an EBLL. For example, during the 1960s the criteria for an EBLL was ≥60 micrograms per deciliter (µg/dL). It then dropped to ≥40 µg/dL in 1971, to ≥30 µg/dL in 1978, ≥25 µg/dL in 1985, and most recently, ≥ 10 µg/dL in 1991.[41]

Roughly 14 out of every 1,000 children in the United States between the ages of 1 and 5 have blood lead levels greater than 10 micrograms of lead per deciliter of blood. This is the level at which public health actions should be initiated according to the Centers for Disease Control and Prevention.

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[35] http://www.cdc.gov/nceh/Lead/
[36] http://www.cdc.gov/nceh/eehs/
[37] http://www2.epa.gov/lead/renovation-repair-and-painting-program
[38] "Protect Your Family". March 2014. *EPA.* Environmental Protection Agency. Web. 2 May 2014. <http://www2.epa.gov/lead/protect-your-family#sl-home>.
[39] Jacobs, David E., Robert P. Clickner, Joey Y. Zhou, Susan M. Viet, David A. Marker, John W. Rogers, Darryl C. Zeldin, Pamela Broene, and Warren Friedman. "The Prevalence of Lead-Based Paint Hazards in U.S. Housing." *Environmental Health Perspectives* 110 (2002): A599-606. *Pub Med*. 12 May 2014 <http://www.pubmedcentral.nih.gov/picrender.fcgi?artid=1241046&blobtype=pdf>.
[40] "Implementation of the Lead Contamination Control Act of 1988." Editorial. *Morbidity and Mortality Weekly Report* 01 May 1992: 288-90. 05 Aug. 1998. Centers for Disease Control. 12 May 2014 <http://www.cdc.gov/mmwr/preview/mmwrhtml/00016599.htm>.
[41] Lanphear, MD MPH, Bruce P et al. "Cognitive Deficits Associated with Blood Lead Concentrations" *Public Health Reports* 115 (2000): 521-29. Pub Med. 12 May 2014 <http://www.pubmedcentral.nih.gov/picrender.fcgi?artid=1308622&blobtype=pdf>.

Results of National Efforts

All of these coordinated and cooperative efforts at the national, state and local levels have created the infrastructure needed to identify high-risk housing and to prevent and control lead hazards. Consequently, EBLLs in U.S. children have decreased dramatically. For example, in 1978 nearly 14.8 million children in the U.S. had lead poisoning; however, by the early 90s that number had dropped substantially to 890,000.[42] According to data collected by the CDC, this number is dropping even more. In 1997, 7.6 percent of children under 6 tested had lead levels ≥10 µg/dL. By 2012, even after the number of children being tested had grown significantly, only 0.62 percent had lead levels ≥10 µg/dL.[43]

Amidst all of this success, a debate exists in the field of epidemiology about the definition of EBLLs in children. A growing body of research suggests that considerable damage occurs even at BLLs below 10 µg/dL. For example, inverse correlations have been found between BLLs <10 µg/dL and IQ, cognitive function and somatic growth.[44] Further, some studies assert that some effects can be more negative at BLLs below 10 µg/dL than above it.[45]

While the CDC acknowledges these associations and does not refute that they are, at least in part, causal, they have yet to lower the level of concern below 10 µg/dL. The reasons the CDC gives for this decision are as follows: it is critical to focus available resources where negative effects are greatest, setting a new level would be arbitrary since no exact threshold has been established for adverse health effects from lead, and the ability to successfully and consistently reduce BLLs below 10 µg/dL has not been demonstrated. [46]

Lead-Based Paint Hazards in Montana

Table MA-20.C presents the total number of housing units estimated to have lead-based paint risks and shows that a significant number of housing units in the state were at risk of lead-based paint contamination, a total of 175,510 units.

Table MA-20.C - Households At Risk of Lead Based Paint Hazard

Year Built	*Households*
1939 or Earlier	53,375
1940 to 1949	18,616
1950 to 1959	33,388
1960 to 1969	22,052
1970 to 1979	48,079
1980 to 1989	.
1990 to 1999	.
2000 to 2004	.
2005 or Later	.
Total	175,510
Data Source: 2012 Five-Year ACS Data	

[42] *Eliminating Childhood Lead Poisoning: A Federal Strategy Targeting Lead Paint Hazards*. Feb. 2000. President's Task Force on Environmental Health Risks and Safety Risks to Children. 12 May 2014 <http://www.cdc.gov/nceh/lead/about/fedstrategy2000.pdf>.

[43] http://www.cdc.gov/nceh/lead/data/StateConfirmedByYear1997-2012.htm

[44] *Preventing Lead Poisoning in Young Children*. Aug. 2005. Centers for Disease Control and Prevention. 12 May 2014 <http://www.cdc.gov/nceh/lead/Publications/PrevleadPoisoning.pdf>.

[45] Matte, MD, MPH, Thomas D., David Homa, PhD, Jessica Sanford, PhD, and Alan Pate. *A Review of Evidence of Adverse Health Effects Associated with Blood Lead Levels < 10 µg/dL in Children*. Centers for Disease Control and Prevention, Work Group of the Advisory Committee on Childhood Lead Poisoning Prevention. 12 May 2014 <http://www.cdc.gov/nceh/lead/ACCLPP/SupplementalOct04/Work%20Group%20Draft%20Final%20Report_Edited%20October%207,%202004%20-%20single%20spaced.pdf>.

[46] *Preventing Lead Poisoning in Young Children*. Aug. 2005. Centers for Disease Control and Prevention. 12 May 2014. <http://www.cdc.gov/nceh/lead/Publications/PrevleadPoisoning.pdf>.

Table MA-20.D presents data regarding the number of households at risk of lead-based paint hazards, broken down by tenure, presence of children age 6 and under, and income. Owner-occupied households showed 13,287 units with young children at risk of lead-based paint exposure, and renter-occupied households showed 10,791 units. In total, 24,078 households showed the capacity to pose lead-based paint health risks for children age 6 or younger. Owner occupied households faced a risk of lead-based paint at all income levels. Renter occupied households had a higher rate of risk for lead-based paint, with lower income levels facing more lead-based paint risks.

Table MA-20.D - Households at Risk of Lead Based Paint by Tenure by Income

Income	***One or more children age 6 or younger***	***No children age 6 or younger***	***Total***
Owner Occupied Households			
30% HAMFI or less	801	8,485	9,286
30.1-50% HAMFI	1,236	12,143	13,380
50.1-80% HAMFI	2,365	20,059	22,423
80.1% HAMFI or more	2,036	12,062	14,098
100.1% HAMFI and above	6,849	56,561	63,410
Total	13,287	109,310	122,596
Renter Occupied Households			
30% HAMFI or less	2,559	11,715	14,273
30.1-50% HAMFI	2,516	10,378	12,894
50.1-80% HAMFI	2,476	11,959	14,435
80.1% HAMFI or more	1,170	5,971	7,141
100.1% HAMFI and above	2,071	11,279	13,349
Total	10,791	51,302	62,093
Total			
30% HAMFI or less	3,360	20,200	23,560
30.1-50% HAMFI	3,752	22,522	26,274
50.1-80% HAMFI	4,841	32,018	36,859
80.1% HAMFI or more	3,206	18,032	21,238
100.1% HAMFI and above	8,919	67,840	76,759
Total	24,078	160,611	184,689
Data Source: 2006–2010 HUD CHAS Data *HUD Area Median Family Income (HAMFI)*			

Montana Lead Removal Efforts

The State of Montana has a commitment to ensure that recipients of HOME, CDBG, and ESG funds administer programs that adequately limit the risks associated with lead-based paint. Recipients of funding through these block grant programs are required to comply with all federal, state and local lead-based paint regulations.

Although a large portion of the state's housing stock may be at risk of lead-based paint exposure, it is important to note that one cannot assume all of these units contain lead-based paint and the presence of lead-based paint alone does not indicate the extent of exposure hazards. Education and awareness of the potential hazards and the need to properly maintain, control, and abate lead based paint is crucial.

Applicants for CDBG and HOME funds are made aware of the requirements of the lead-based paint regulations before they apply for funds. If funded, applicants receive additional information on dealing with lead-based paint hazards. Technical assistance is available throughout the project. Commerce also promotes lead training whenever it is offered in Montana. Both the CDBG and HOME Programs allow funds to be used to assist with the cost of lead-based paint removal activities, depending upon the type of activity being funded.

The State of Montana supports rehabilitation and construction activities in order to ensure that households, particularly those with children, benefiting from federal housing programs are safe from LBP hazards. 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, or painting activities are certified and use lead-safe work practices, as required by the U.S. Environmental Protection Agency. If structures are being funded by CDBG or HOME for rehabilitation or homebuyer assistance activities, the units must be tested for LBP and if positive, the LBP must be removed during rehabilitation or prior to occupancy. HOME or CDBG-assisted units constructed before 1980 must be tested for lead-based paint using HUD Performance Characteristics Sheet Testing and applicable industry standards. CDBG or HOME-assisted units must be free of lead-based paint prior to occupancy. In addition, UPCS inspections will be performed annually at HOME, Section 8, and other public rental properties throughout the state. For many projects, CDBG and HOME program funds can to be used to assist with the cost of LBP testing and remediation activities.

The Community Development and Housing Divisions will add 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.

The more populated areas of the state tend to have more access to resources for appropriately dealing with LBP hazards; however, rural areas of the state, where rehabilitation is often the largest part of housing strategies, remain under-prepared to address lead-based paint hazards. Significant portions of rehabilitation program budgets now go to addressing LBP hazards, and there is an increasing need for federal funding to support the remediation of LBP hazards.

The state has only one accredited lead analysis laboratory, Northern Analytical Laboratories of Billings, which can perform analyses on paint chips, dust wipes, and soil. The state also has several individual contractors and a limited number of companies certified to perform LBP activities within the state.

Vacant Housing

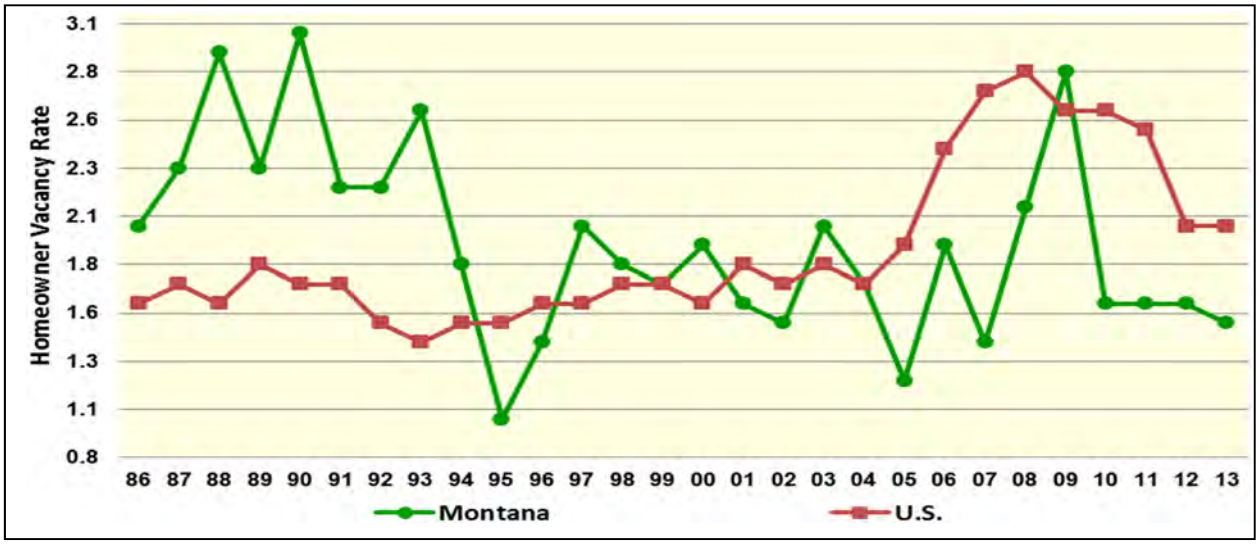
Table MA-20.E shows the change in number of vacant housing units between the 2000 and 2010 Census. Growth in the vacant housing stock between 2000 and 2010 was driven largely by an increase in the number of units classified as seasonal, accounting for 52.6 percent of the total vacant housing units. The second disposition group with the most growth over this time period was "other vacant." These units are typically the most problematic, as they are not available to the market place. Where such units are grouped in close proximity to each other, a blighting influence may be created. There were over 4,000 more "other vacant" units in 2010 than there had been in 2000, and these units accounted for 22.2 percent of all vacant units at the end of the decade. By contrast, there were 16.3 percent fewer vacant units that were rented or sold but not occupied.

Table MA-20.E – Change in Vacant Housing Units

Disposition	*2000 Census*		*2010 Census*		*% Change 00–10*
	Units	*% of Total*	*Units*	*% of Total*	
For Rent	9,163	17.0%	10,082	13.8%	10.03%
For Sale	5,581	10.3%	5,964	8.1%	6.86%
Rented or Sold, Not Occupied	2,540	4.7%	2,126	2.9%	-16.30%
For Seasonal, Recreational, or Occasional Use	24,213	44.9%	38,510	52.6%	59.05%
For Migrant Workers	248	0.5%	283	0.4%	14.11%
Other Vacant	12,221	22.6%	16,253	22.2%	32.99%
Total	53,966	100.0%	73,218	100.0%	35.7%
Data Source: 2000 & 2010 Census SF1 Data					

Census data regarding homeowner vacancy rates, as drawn from the annual surveys conducted by the Census Bureau, were also examined. As shown in Figure 4, the homeowner vacancy rate in Montana has fluctuated and crossed intersected that national rate at various times throughout the past 27 years. After spiking in 2010, however, the homeowner vacancy rate for the state has been steadily decreasing and has been hovering around 1.6 percent.

Figure 4 - Homeowner Vacancy Rate in Montana



Data Source: Census Data, 1984 – 2014

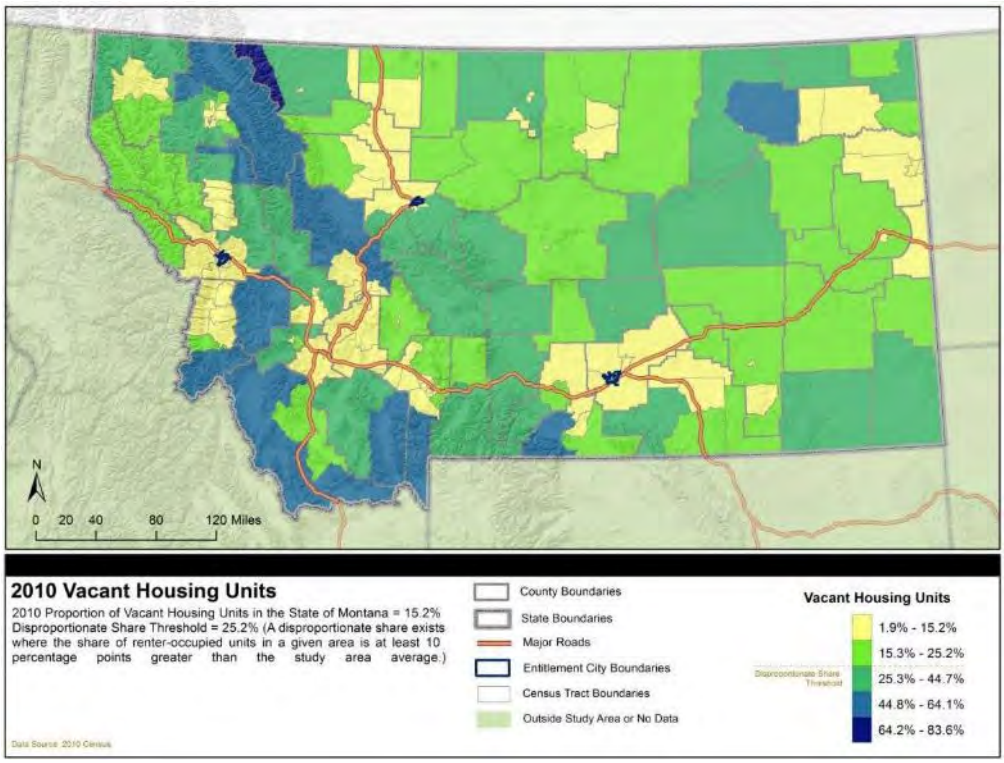
Some of these patterns are reflected in the rental vacancy rates, as shown in Figure 5. With the exception of the mid-1980s and one point in 2005, rental vacancy rates in Montana have remained lower than national rates. The state has seen a steady drop in these vacancy rates since a peak in 2005.

Figure 5 - Rental Vacancy Rate in Montana

Data Source: Census Data, 1984 – 2014

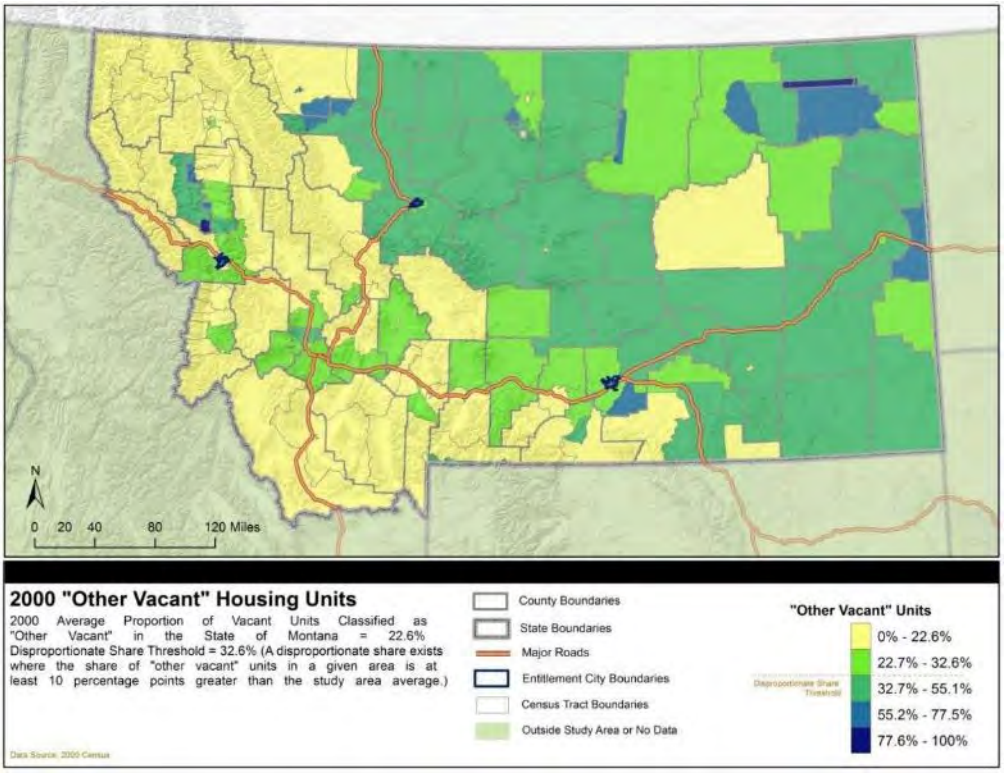
Map 3 shows the distribution of vacant units across the state as of the 2010 Census. There tended to be higher concentrations of vacant units in the western portion of the state, with almost all of the Census tracts with vacancy rates 44.8 to 64.1 percent on the western side of the state. By contrast, however, vacant units classified as "other vacant" were concentrated in the eastern portion of the state. Maps 4 and 5 demonstrate the change and location of "other vacant" units throughout the state between the 2000 and 2010 Census.

Map 3 - Vacant Housing Units



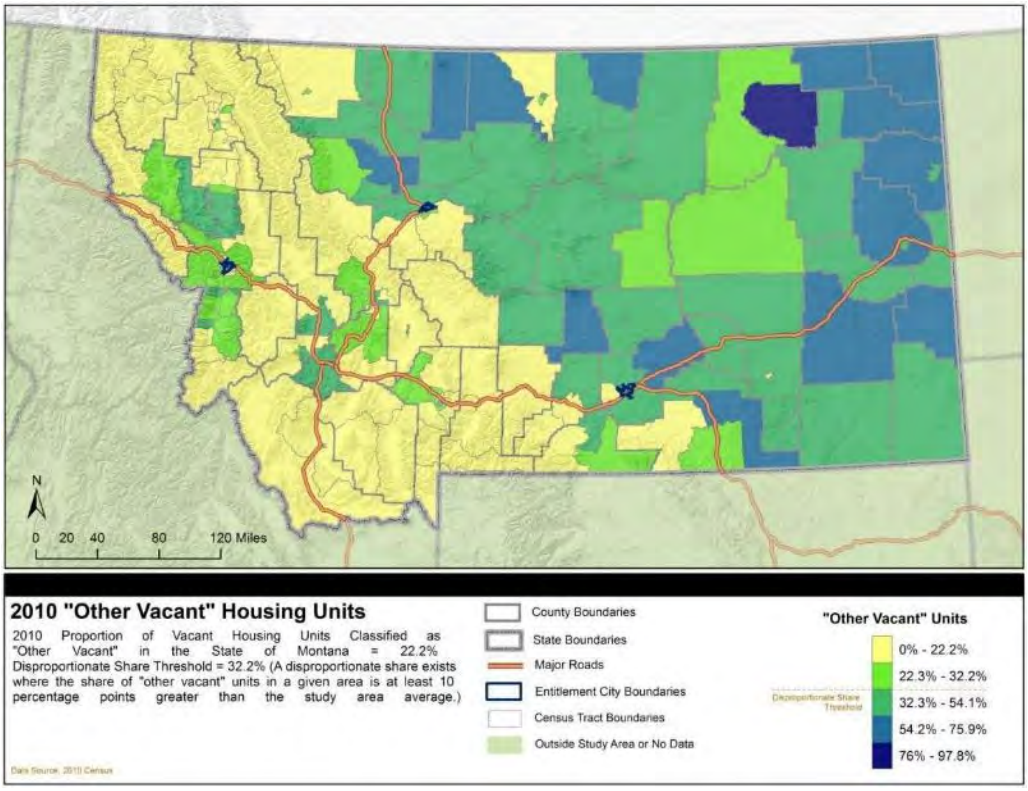
Data Source: 2010 Census Data

Map 4 – 2000 Census, "Other Vacant" Housing Units



Data Source: 2000 Census Data

Map 5 - 2010 Census, "Other Vacant" Housing Units



Data Source: 2000 Census Data

MA-25 Public and Assisted Housing

Introduction

Below is some brief information regarding Public Housing. Table 40 was generated from the IDIS system within this "Optional" Section.

Totals Number of Units

Table 38 – Total Number of Units by Program Type

Program Type									
				Vouchers					
							Special Purpose Voucher		
	Certificate	***Mod-Rehab***	***Public Housing***	***Total***	***Project-based***	***Tenant-based***	***Veterans Affairs Supportive Housing***	***Family Unification Program***	***Disabled****
# of units vouchers available	0	292		3,861	0	3,861	364	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									
Data Source: PIC (PIH Information Center)									

Describe the supply of public housing developments:

Montana has 20 Public Housing Authorities administering subsidized housing in local communities. There are 129 public housing properties for the elderly and disabled, representing 6,647 total units (5,394 with assistance; 1,173 for the elderly; 220 designated for the disabled; and 1,467 with accessible features). There are 89 Project-Based Section 8 multifamily properties (representing 4,102 units) and 8 Housing Credit properties across the state featuring affordability for income-qualified families. In addition, there are 136 multifamily rental properties whose construction was assisted with USDA-RD funds.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

There are 89 Project-Based Section 8 multifamily properties (representing 4,102 units) and 8 Housing Credit properties across the state featuring affordability for income-qualified families. All project-based public housing is subject to Management and Occupancy Reviews (MOR) annually, which includes a minimum of 10% of units and unit files. Any occupied projects with units having exigent health and safety issues on their last REAC (see below) inspection are re-inspected for ongoing compliance.

The Real Estate Assessment Center (REAC) reviews are scheduled by HUD based upon HUD's assigned score. All units must meet HUD Housing Quality Standards (HQS). None are currently participating in an approved Public Housing Agency Plan.

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

The state-wide Public Housing Authority (PHA) does not own or operate any public housing units, and only administers Section 8 vouchers. However, vacancy rates are extremely low in all our communities and the waiting list is very large; losing any public housing units would be detrimental. Commerce is concerned about the number of public housing units and any underlying contracts that may be at risk of expiring. If this were to happen it would severely affect the affordable housing stock in the state. The state remains committed to encouraging the rehabilitation of existing rental and owner-occupied homes, particularly for those with special needs and the elderly. The state is concerned about the funding for these activities. Effective use of programs capable of funding restoration and revitalization activities is increasingly difficult given the fluctuating and declining levels of funding in recent years.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing.

As Montana's statewide public housing agency, Commerce does not have any public housing and only administers vouchers, this question is not applicable.

Montana Rental Vacancy Survey

The Montana Rental Vacancy Survey was conducted in 2014 to provide a current picture of vacancy rates throughout Montana. The telephone survey contacted 1,578 properties in each county across the state, totaling more than 42,700 rental units. Each property was attempted to be contacted at least five times, at various times and days, if needed. Properties were located through local newspapers, Craigslist, local Chambers of Commerce, local real estate brokers, rural development websites, housing authorities, and HUD. The survey collected data

regarding vacancy, prices, and housing characteristics. The section below describes the findings of the survey for the state. Additional data from the survey are available in the Appendices of this document – 2014 Rental Vacancy Survey.

The state showed a total vacancy rate of 3.7 percent. However, the range of vacancy rates was extremely wide with a 40 percent vacancy rate in Judith Basin County and a vacancy rate of zero in Blaine County. In counties that had more than 1,000 units, Missoula County had the highest vacancy rate at 5.2 percent, and Flathead County had the lowest at 1.8 percent. Eight contacted counties did not have respondents, but indicated there were none available or stated that rentals were advertised by word of mouth. These included rentals in Carter, Garfield, Golden Valley, McCone, Powder River, Prairie, Treasure, and Wibaux Counties. The results, by county, are shown in Table MA-25.A.

The Survey indicated that statewide, apartments had a vacancy rate of 4.3 percent, and single family homes had a vacancy rate of 2.9 percent. Apartments with four bedrooms had the lowest vacancy rate, followed by apartments with three bedrooms. Single family units with one bedroom had the lowest vacancy rate, followed by three bedrooms. Mobile homes had an overall vacancy rate of 4.0 percent, with two bedroom mobile home units having the lowest vacancy rate at 2.1 percent.

The survey also asked respondents questions about rents for each unit. The average market rate rent was $888.20 for single family units, $694.20 for apartments, $614.70 for mobile homes, and $732.30 for "other" units. Single family units with rents between $1,000 and $1,500 had the lowest vacancy rate at 2.5 percent, and 3.5 percent of units with rents between $500 and $1,000 were vacant. The survey also found that 81.5% of units included some or all utilities in the cost of rent, the most being water/sewer.

Table MA-25.A - Rental Vacancy Survey by County

County	*Total Units*	*Available Units*	*Vacancy Rate*	*County*	*Total Units*	*Available Units*	*Vacancy Rate*
Beaverhead	164	14	8.5%	McCone	1	0	0.0%
Big Horn	68	5	7.4%	Meagher	22	3	13.6%
Blaine	147	0	0.0%	Mineral	24	3	12.5%
Broadwater	3	1	33.3%	Missoula	9,214	479	5.2%
Carbon	254	7	2.8%	Musselshell	74	5	6.8%
Carter	1	0	0.0%	Park	651	17	2.6%
Cascade	3,603	161	4.5%	Petroleum	6	0	0.0%
Chouteau	144	24	16.7%	Phillips	32	0	0.0%
Custer	348	16	4.6%	Pondera	121	21	17.4%
Daniels	44	2	4.5%	Powder River	1	0	0.0%
Dawson	367	6	1.6%	Powell	28	1	3.6%
Deer Lodge	304	7	2.3%	Prairie*	1	0	0.0%
Fallon	12	0	0.0%	Ravalli	721	43	6.0%
Fergus	383	33	8.6%	Richland	196	2	1.0%
Flathead	2,901	52	1.8%	Roosevelt	662	1	0.2%
Gallatin	5,422	122	2.3%	Rosebud	470	13	2.8%
Garfield*	1	0	0.0%	Sanders	67	3	4.5%
Glacier	135	17	12.6%	Sheridan	12	1	8.3%
Golden Valley*	1	0	0.0%	Silver Bow	1,598	34	2.1%
Granite	13	1	7.7%	Stillwater	168	16	9.5%
Hill	660	7	1.1%	Sweet Grass	36	10	27.8%
Jefferson	146	11	7.5%	Teton	25	4	16.0%
Judith Basin	20	8	40.0%	Toole	106	7	6.6%
Lake	1,710	80	4.7%	Treasure*	1	0	0.0%
Lewis And Clark	2,876	97	3.4%	Valley	237	2	0.8%

Liberty	16	2	12.5%	Wheatland	30	1	3.3%
Lincoln	462	19	4.1%	Wibaux*	1	0	0.0%
Madison	64	2	3.1%	Yellowstone	7,951	218	2.7%
Data Source: 2014 Montana RVS Survey							

The survey indicated that 22.3 percent of units had some sort of rental subsidy or assistance. The average assisted rental rates by bedroom size are shown in Table MA-25.B. Apartments were the most likely units to receive rental subsidies or assistance, with 31.9 percent of apartments utilizing assistance. Some 12.4 percent of single family units had assistance, 7.1 percent of mobile homes, and 1.0 percent of "other" units.

Table MA-25.B - Average Assisted Rental Rates

Number of Bedrooms	*Single Family*	*Apartment*	*Mobile Homes*	*"Other"*	*Average Assisted Rents*
Efficiency	$	$485.6	$	$	$485.6
One	$223.8	$448.2	$300.0	$	$561.6
Two	$327.5	$494.4	$428.0	$	$690.5
Three	$693.4	$612.1	$650.0	$	$905.3
Four	$110.0	$681.5	$	$300.0	$1,327.4
Total	$405.0	$464.0	$427.1	$300.0	$447.1
Data Source: 2014 Montana RVS Survey					

Table MA-25.C shows the number of units with voucher assistance in Montana. There are 1,101 units with vouchers that are public housing units. There are 292 units that are project-based rental assistance known as Mod- Rehab. Under the special purpose voucher category 364 vouchers are for Veteran's Affairs supportive housing. Finally, there are 73 vouchers for people with disabilities.

Table MA-25.C - Units with Voucher Assistance

	Vouchers						
					Special Purpose Vouchers		
	Shelter Plus Care I & II	*Mod-Rehab*	*Project-Based*	*Tenant-Based*	*Veterans Affairs Supportive Housing*	*Family Unification Program*	*Disabled**
# of units/vouchers available	42	309	4,102	3,000	250		
Disabled HOH** or Disabled HH Member	24	108	898 accessible; 1,466 disabled HOH	1,665	93		
*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-Year and Nursing Home Transition							
**We do not track accessible units for the programs we administer with the exception of the Project Based Program. However, we can tell is the Head of Household or one of the members of the household is disabled. This is not a direct correlation to accessible units but could be an indicator.							
Data Source: PIC (PIH Information Center)							

The survey included questions regarding how long until units typically become vacant and how long each unit will typically remain vacant. For single-family units statewide, the average number of days before a unit becomes vacant was over 153 days. The average number of days to fill a vacant single family unit was found to be almost 34 days. Apartment units had an average of 136 days before it would become vacant, and took an average of 25 days to fill a vacant apartment unit. Mobile homes had an average of 137 days before it would become vacant, and took an average of 28 days before a vacant mobile unit would be filled.

The survey indicated respondents' perceptions of the statewide need for renovation and construction of new units. Renovation of existing apartments received the most responses indicating an extreme, high or moderate need. This was followed by renovation for single family units. These results are shown in Table MA-25.D.

Table MA-25.D - Need for Renovation of Existing Units

Need	*Single Family*	*Apartments*	*Mobile Homes*	*Other Units*
No Need	50	68	29	2
Low Need	64	89	26	4
Moderate Need	141	193	59	11
High Need	70	82	25	6
Extreme Need	54	76	33	5
Data Source: 2014 Montana RVS Survey				

New construction of apartments also received the greatest number of responses indicating an extreme, high, or moderate need. These results are shown in Table MA-25.E. Additionally, respondents indicated that an average of 45.3 percent of new units should offer rental assistance.

Table MA-25.E - Need for Construction of New Units

Need	*Single Family*	*Apartments*	*Mobile Homes*	*Other Units*
No Need	110	159	45	7
Low Need	89	127	37	4
Moderate Need	76	111	40	6
High Need	70	97	18	8
Extreme Need	68	100	31	3
Data Source: 2014 Montana RVS Survey				

Figure 11 shows the rental vacancy rates across the state. The Western region of the state contains only one county with a vacancy rate higher than the disproportionate share, as determined by the Rental Vacancy Survey. Excluding the 33.3 percent vacancy rate in Broadwater County, the rest of the Western region has vacancy rates that vary from 1.8 percent to 13.6 percent.

This is in contrast with the Central portion of the state. This area contained counties with much higher vacancy rates, with 5 counties having vacancy rates above 13.7 percent. These include Pondera, Teton, Chouteau, Judith Basin, and Sweet Grass Counties. This is contrasted within this region by vacancy rates of zero in Blaine, Fergus and Petroleum Counties.

The Eastern region of Montana has no counties with elevated vacancy rates. The Bakken oil fields, as demonstrated in the map, have had an impact on the rental market in this region of the state. Some counties in this region face very low rental vacancy rates as rental housing fails to keep up with the demands of growth in this region.[47]

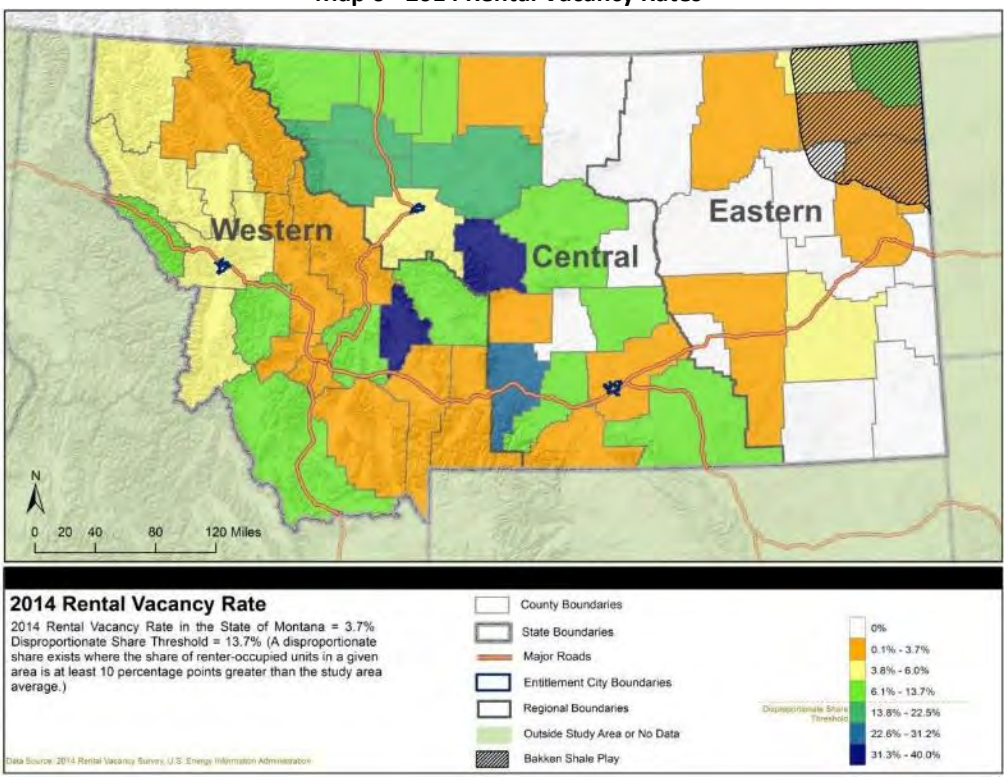
Summary

In 2000, the State of Montana had 412,633 total housing units. Since that time, the total housing stock increased each year by a total of over 73,000 units, reaching 485,771 units in 2013. According to the American Community Survey in 2012, Montana's housing stock included 346,912 single family units, and 54,345 mobile home units. Of the 482,825 housing units counted in Montana in the 2010 census, 409,607 units were occupied, with 278,607 counted as owner-occupied and 131,189 counted as renter-occupied. This equated to a homeownership rate of

[47]The survey did contact Realtors and others in the real estate industry, only to be told nothing was available. For these counties, one unit, already rented, was added to the exhibits.

68.0 percent. The Rental Vacancy Survey indicated a vacancy rate throughout the state of 3.7 percent. The construction value of single-family dwellings generally increased from 1980 through 2013, reaching over $210,000.

Map 6 - 2014 Rental Vacancy Rates



Data Source: 2014 Montana Rental Vacancy Survey

Commercial Properties Used for Residential Purposes

Additional data was collected regarding commercial properties used for residential purposes. Table MA-25.F shows 15,535 commercial residential structures by type and year built. The highest proportions of these structures were duplexes, accounting for 31.2 percent of all structures. The majority, 68.6 percent, of duplexes were built before 1980. The next most common commercial residential structures included four-plexes, condominiums/townhouses, and apartments less than four stories.

Table MA-25.F - Commercial Residential Structures - Type by Year Built (Based on Total Commercial Residential Structures)

Commercial Structure	*1959 and Earlier*	*1960-1969*	*1970-1979*	*1980-1989*	*1990-1999*	*2000-2009*	*2010*	*2011*	*TOTAL*
Single Family	781	79	89	78	111	119	11	13	1,281
Duplex	1,770	540	1,014	385	485	605	30	15	4,844
Triplex	509	70	97	64	65	53	7	8	873
Fourplex	621	256	743	362	277	324	27	22	2,632
Condominium/ Townhouse	105	381	200	264	457	1,132	19	15	2,573
Boarding/Rooming House	46	4	7	9	17	16	0	0	99
Apartment < 4 story	782	150	492	268	269	328	21	34	2,344
Apartment 4 story+	13	1	11	2	0	6	2	0	35
Mixed Use Built as Residential	378	36	33	37	33	24	0	1	542

Mixed Use Built as Commercial	186	16	18	15	22	48	3	4	312
Total	5,191	1,533	2,704	1,484	1,736	2,655	120	112	15,535
Data Source: MT DOR 2012									

Table MA-25.G presents this same information broken down by units rather than by structures. There were 61,513 units counted in this data, and apartment units in buildings less than four stories were the most frequent units, accounting for 40.8 percent of units. Four-plexes were the next most common unit type, accounting for 17.0 percent of units. The data shows that 23.7 percent of four-plex units were built before 1960, and 37.6 percent of duplex units were built before 1960.

Table MA-25.G- Commercial Residential Units – Type by Year Built

Commercial Structure	*1959 and Earlier*	*1960-1969*	*1970-1979*	*1980-1989*	*1990-1999*	*2000-2009*	*2010*	*2011*	*TOTAL*
Single Family	888	79	92	83	135	134	33	13	1,457
Duplex	3,522	1,077	2,025	768	987	1,207	47	26	9,659
Triplex	1,463	207	285	190	193	155	19	25	2,537
Fourplex	2,480	1,026	2,987	1,448	1,123	1,248	93	79	10,484
Condominium/ Townhouse	386	530	1,187	1,187	1,551	3,996	90	22	8,949
Boarding/Rooming House	226	62	43	62	82	119	0	0	594
Apartment < 4 story	6,091	1,547	5,703	2,832	3,582	4,739	217	413	25,124
Apartment 4 story+	460	45	591	16	0	101	30	0	1,243
Mixed Use Built as Residential	440	37	38	37	34	154		6	746
Mixed Use Built as Commercial	540	19	29	19	45	54	3	11	720
Total	16,496	4,629	12,980	6,642	7,732	11,907	532	595	61,513
Data Source: MT DOR 2012									

Over half of all residential commercial structures built in 1959 and earlier had an average grade, and 63.8 percent had a grade of average or above. Some 90.3 percent of all commercial residential structures built after 1960 had a grade at or above average. These breakdowns can be seen in Table MA-25.H.

Table MA-25.H- Commercial Residential Structures – Year Built by Grade

Year Built	*Low Cost*	*Fair*	*Average*	*Good*	*Very Good*	*Excellent*	*TOTAL*
1959 and Earlier	557	1,320	2,818	492	0	4	5,191
1960-1969	36	160	1,159	177	1	0	1,533
1970-1979	49	200	2,031	423	0	1	2,704
1980-1989	35	181	1,059	203	3	3	1,484
1990-1999	43	123	1,196	352	5	17	1,736
2000-2009	49	120	1,944	439	70	33	2,655
2010	2	4	100	14	0	0	120
2011	0	6	88	11	0	7	112
Total	771	2,114	10,395	2,111	79	65	15,535
Data Source: MT DOR 2012							

Similarly, commercial residential structures, based on the total number of units, showed that 68.9 percent of units built prior to 1960 had a grade of average or above, as seen in Table MA-25.I. This data shows that 59.4 percent of units with a grade of low-cost or fair were built before 1960.

Table MA-25.J shows data regarding the number of units in commercial residential structures by year built. Structures built prior to 1960 were most likely to have one or two units, with those structures accounting for 62.6 percent of all units built before 1960. This trend continues in the 1960s, with 70.0 percent of commercial

residential structures having one or two units. Structures built in the 1970s and 1980s were more likely to have two or four units, with two and four units structures accounting for 64.8 percent of structures during that time frame. Structures built in the 1990s and 2000s continued to follow this pattern.

Table MA-25.I- Commercial Residential Structures - Year Built by Grade
(Based on Total Commercial Residential Units)

Year Built	*Low Cost*	*Fair*	*Average*	*Good*	*Very Good*	*Excellent*	*TOTAL*
1959 and Earlier	1,208	3,922	9,736	1,621	5	4	16,496
1960-1969	130	456	3,274	769	0	0	4,629
1970-1979	180	859	9,885	2,045	7	4	12,980
1980-1989	106	667	4,570	1,284	0	37	6,664
1990-1999	94	403	5,232	1,969	10	24	7,732
2000-2009	107	484	8,436	2,459	313	108	11,907
2010	3	6	459	64	0	0	532
2011	0	7	507	77	0	4	595
Total	1,828	6,804	42,099	10,288	335	181	61,535
Data Source: MT DOR 2012							

Table MA-25.J - Commercial Residential Structures - Year Built by Dwelling Units
(Based on Total Commercial Residential Structures)

Year Built	*1 Unit*	*2 Units*	*3 Units*	*4 Units*	*5-8 Units*	*9-12 Units*	*13-24 Units*	*25-49 Units*	*More than 48 Units*	*TOTAL*
1959 and Earlier	1,437	1,813	546	673	498	111	72	31	10	5,191
1960-1969	478	549	73	292	73	39	16	12	1	1,533
1970-1979	239	1,047	111	818	262	101	72	36	18	2,704
1980-1989	251	400	79	450	185	70	33	8	8	1,484
1990-1999	287	673	106	365	165	75	32	20	13	1,736
2000-2009	344	1,106	188	548	224	120	83	21	21	2,655
2010	37	20	14	28	5	7	7	2	0	120
2011	37	19	8	20	13	4	8	3	0	112
Total	3,110	5,627	1,125	3,194	1,425	527	323	133	71	15,535
Data Source: MT DOR 2012										

Types of commercial residential structures are shown by grade in Table MA-25.K. The highest number of structures with a low cost grade was single family structures, accounting for 38.1 percent of low-cost structures and only 8.2 percent of total structures. 85.3 percent of structures classified as duplex, triplex, or four-plex, had a grade of average or above. Similarly, 79.5 percent of apartment structures, both greater and less than four stories, had a grade of average or higher.

Table MA-25.K - Commercial Residential Structures - Type by Grade
(Based on Total Commercial Residential Structures)

Commercial Structure	*Low Cost*	*Fair*	*Average*	*Good*	*Very Good*	*Excellent*	*TOTAL*
Single Family	296	317	506	148	3	11	1,281
Duplex	133	630	3,476	592	3	10	4,844
Triplex	40	146	572	115	0	0	873
Fourplex	25	250	1,981	375	1	0	2,632
Condominium / Townhouse	42	106	1,780	544	64	37	2,573
Boarding/Rooming House	14	21	41	21	1	1	99
Apartment < 4 story	105	379	1,595	263	1	1	2,344
Apartment 4 story+	0	3	22	4	5	1	35
Mixed Use Built as Residential	56	138	306	38	0	4	542
Mixed Use Built as Commercial	60	124	116	11	1	0	312
Total	771	2,114	10,395	2,111	79	65	15,535
Data Source: MT DOR 2012							

Table MA-25.L breaks down the above information by units. Some 14.0 percent of units in commercial residential structures had grades of low-cost or fair. The highest number of units in these two categories belongs to apartments that have less than four stories.

Table MA-25.L - Commercial Residential Units - Type by Grade
(Based on Total Commercial Residential Units)

Commercial Structure	*Low Cost*	*Fair*	*Average*	*Good*	*Very Good*	*Excellent*	*TOTAL*
Single Family	336	346	566	205	0	4	1,457
Duplex	289	1,264	6,895	1,186	6	19	9,659
Triplex	111	433	1,649	341	3	0	2,537
Fourplex	97	991	7,880	1,508	4	4	10,484
Condominium / Townhouse	136	411	5,765	2,229	280	150	8,971
Boarding/Rooming House	35	95	253	211	0	0	594
Apartment < 4 story	673	2,729	17,467	4,255	0	0	25,124
Apartment 4 story+	0	106	946	149	42		1,243
Mixed Use Built as Residential	60	150	358	174		4	746
Mixed Use Built as Commercial	91	279	320	30	0	0	720
Total	1,828	6,804	42,099	10,288	335	181	61,535
Data Source: MT DOR 2012							

Table MA-25.M presents the average percent good by grade for commercial residential structures. According to the Montana Appraisal Manual, "percent good" is decided based upon the structure's observed age and the established CDU. 12.5 percent of structures had an average percent good of less than 50 percent. These structures were almost all exclusively in grade categories from low-cost to average.

Table MA-25.M - Commercial Residential Structures - Average Percent Good by Grade
(Based on Total Commercial Residential Structures)

Grade	*0-9% Good*	*10-19% Good*	*20-29% Good*	*30-39% Good*	*40-49% Good*	*50-59% Good*	*60-69% Good*	*70-79% Good*	*80-89% Good*	*90-100% Good*	*Total*
Low Cost	15	41	31	115	135	196	108	48	43	39	771
Fair	9	20	42	203	300	646	478	220	104	92	2,114
Average	302	51	25	234	412	1,523	2,953	1,590	1,506	1,799	10,395
Good	1		1	1	10	84	296	420	892	440	2,145
Very Good							2	3	5	52	62
Excellent							3	3	15	27	48
Total	327	112	99	553	857	2,449	3,840	2284	2,565	2,449	15,535
Data Source: MT DOR 2012											

Table MA-25.N present this information broken down by units. There are 1,293 units in commercial residential structures that have an average percent good rating of 0 to 29 percent. With the exception of 14 units, these all are in grades low-cost, fair, or average. In addition, there are 12,850 units in commercial residential structures that have average percent good ratings between 30 and 59 percent. With the exception of 300 units, these are all in the grades low-cost, fair, or average.

Table MA-25.N Commercial Residential Units - Average Percent Good by Grade
(Based on Total Commercial Residential Units)

Grade	*0-9% Good*	*10-19% Good*	*20-29% Good*	*30-39% Good*	*40-49% Good*	*50-59% Good*	*60-69% Good*	*70-79% Good*	*80-89% Good*	*90-100% Good*	*Total*
Low Cost	22	138	120	210	346	372	344	107	99	70	1,828
Fair	42	53	165	765	918	1,896	1,518	661	469	317	6,804

Average	426	117	196	761	1,910	5,372	12,478	5,910	6,838	8,091	42,099
Good	1	.	13	7	35	258	1,751	1,706	4,242	2,275	10,288
Very Good	.	.	.	.	.	.	5	6	17	307	335
Excellent	.	.	.	.	.	.	7	40	22	112	181
Total	491	308	494	1,743	3,209	7,898	16,103	8430	11,687	11,172	61,535
Data Source: MT DOR 2012											

The majority of commercial residential structures in Montana are classified as 50 percent good or higher. In fact, 89.9 percent of units in from this data are 50 percent good or higher. Structures that are low-cost to fair, and are zero to 29 percent good may not benefit enough from renovation and may require demolition. This includes 582 structures, accounting for only 0.9 percent of commercial residential structures. Those structures that have a higher percent good, approximately 30 percent to sixty percent, but still in the low-cost and fair grades, may benefit from renovation. These structures account for 7.3 percent of the total commercial residential structures in presented by this data.

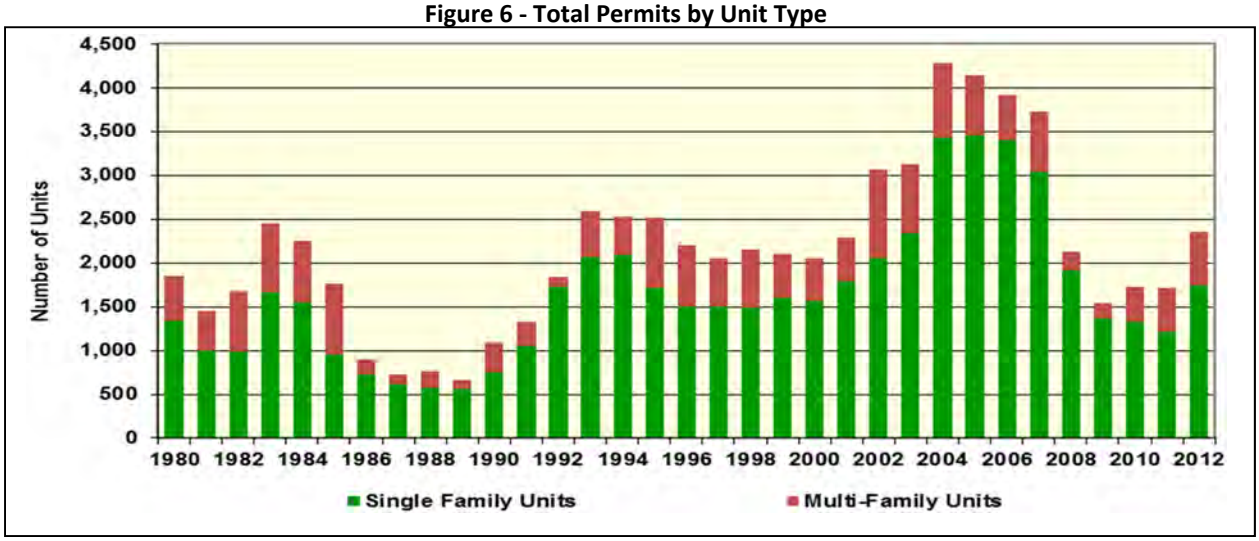
With 2.3 percent of residential property class units and 7.3 percent of commercial property class in need of rehabilitation, opportunities exist for advancing the provision of affordable housing within Montana's existing infrastructure. In addition, 5.3 percent of residential property class units and 0.9 percent of commercial property class units may be in need of demolition. Redevelopment opportunities exist, especially in units that are concentrated in certain areas of the state.

Housing Production

The Census Bureau reports the number of residential building permits issued each year for permit issuing places, including those in the state of Montana. Reported data are single family units, duplexes, and tri- and four-plex units and all units within facilities comprising five or more units.

The number of single-family and multi-family units permitted in the State of Montana has varied considerably by year between 1980 and the present (Figure 12). Housing production in the 1980s peaked in the middle of the decade, and nearly 2,500 new units were permitted in 1984. Housing production increased in the early 1990s, and increased dramatically in 2004, reaching over 4,000 units. This dropped sharply in 2008 and has begun to climb again in 2012. Single family units have dramatically outnumbered multi-family units since 1980, and this trend has continued in the more recent decades. This data does not reflect the number of units built without permits.

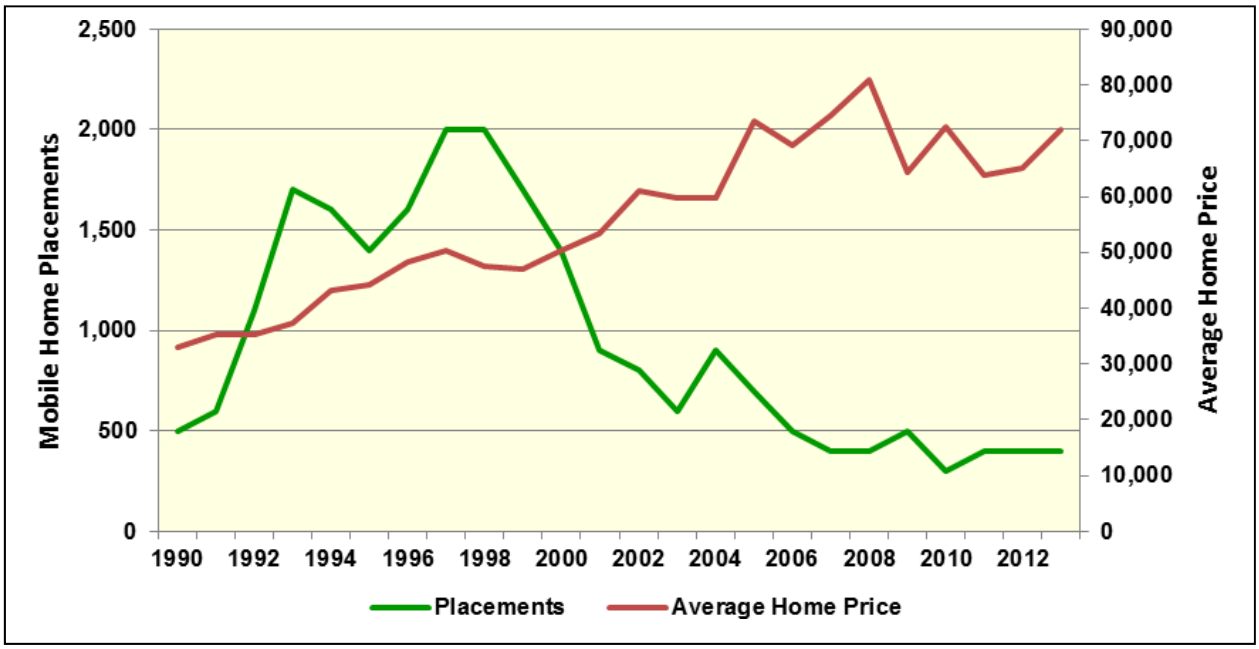
Figure 6 - Total Permits by Unit Type



Data Source: U.S. Census Building Permit Data

Figure 13 presents data on the number of manufactured homes placed in Montana, along with data regarding average price. Manufactured homes do not require a permit and are therefore not included in the previous data regarding housing permit activity. The figure shows that placements have decreased since its peak in 1998 with approximately 2,000 homes. Also, the price of the homes has increased from approximately $35,000 in 1990 to about $70,000 in 2012.

Figure 7 -Mobile Home Placements and Average Price



Data Source: U.S. Census Data

Table MA-25.O breaks down the manufactured home placements and prices by year. In total, there were 22,800 manufactured homes placed in Montana between 1990 and 2013, including roughly 6,900 single-wide and 13,900

double-wide homes. The figures varied by year, but the number of units being placed has declined as the price per unit has risen. The number of units being placed saw a sharp decline beginning in the mid-1990s, as the price of mobile homes in Montana started to rise above the national average. Figure 13 demonstrates this shift.

Table MA-25.O- Manufactured Housing Unit Placement and Price

Year	*Units Placed in Service in Montana*			*Average Home Price, Nominal Dollars*					
				State of Montana			*U.S. Average*		
	Single-wide	*Double-wide*	*Total**	*Single-wide*	*Double-wide*	*Total*	*Single-wide*	*Double-wide*	*Total*
1990	(S)	(S)	500	(S)	(S)	33,100	19,800	36,600	27,800
1991	(S)	(S)	600	(S)	(S)	35,200	19,900	36,900	27,700
1992	500	600	1,100	24,800	44,200	35,400	20,600	37,200	28,400
1993	800	800	1,700	29,400	44,400	37,400	21,900	39,600	30,500
1994	600	1,000	1,600	34,100	49,400	43,300	23,500	42,000	32,800
1995	600	800	1,400	44,200	32,900	51,000	25,800	44,600	35,300
1996	600	1,000	1,600	27,000	46,200	37,200	39,400	53,900	48,300
1997	600	1,300	2,000	36,800	54,400	50,200	27,900	48,100	39,800
1998	700	1,200	2,000	34,400	53,600	47,400	28,800	49,800	41,600
1999	600	1,100	1,700	35,600	53,200	46,900	29,300	51,100	43,300
2000	300	1,100	1,400	(S)	55,000	50,400	30,200	53,600	46,400
2001	(S)	700	900	(S)	56,600	53,500	30,400	55,200	48,900
2002	(S)	500	800	(S)	62,700	61,100	31,900	59,700	54,900
2003	100	500	600	48,800	61200	59,800	32,900	63,400	58,200
2004	200	700	900	61,200	48,800	59,800	32,900	63,400	58,200
2005	(S)	600	700	(S)	72,000	73,400	34,100	68,700	62,600
2006	200	300	500	41,000	81,100	69,300	36,100	71,300	64,300
2007	100	300	400	49,700	87,000	74,600	37,300	74,200	65,400
2008	100	300	400	(S)	81,000	81,000	38,000	75,800	64,700
2009	200	300	500	43,500	76,700	64,400	39,600	74,500	63,100
2010	100	200	300	43,100	78,400	72,500	39,500	74,500	62,800
2011	200	200	400	47,500	83,900	63,800	40,600	73,900	60,500
2012	200	200	400	48,400	84,800	65,100	41,100	75,700	62,200
2013	200	200	400	49,900	89,800	72,000	42,200	78,600	64,000

* Values may not sum correctly to the total due to other types of manufactured housing units, such as two story units.

(S) = Suppressed because estimate is based on fewer than five responses.

Data Source: Census Data, 1990 – 2013

MA-30 Homeless Facilities and Services

Introduction

The Montana Department of Public Health and Human Services (DPHHS) works with the MTCoC to leverage resources and provide increased and coordinated services to homeless across the state.

ESG funds are used to meet the needs of the homeless or those at risk of homelessness at the local level. Activities include rental assistance, financial assistance of rental application fees, security and utility deposits and payments, case management, housing search and support for toll free telephone referral hotlines for domestic abuse and other homeless individuals and families; and referral to mainstream resources; assistance to shelters for the homeless and victims of domestic and sexual violence, youth homes, and food banks. All HRDCs submit work plans, budgets, and reports outlining which of the allowable activities will be undertaken.

Facilities Targeted to Homeless Persons

Table 39 - Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		*Transitional Housing Beds*	*Permanent Supportive Housing Beds*	
	Year Round Beds (Current & New)	*Voucher / Seasonal / Overflow Beds*	*Current & New*	*Current & New*	*Under Development*
Households with Adult(s) and Child(ren)	351	65	335	304	0
Households with Only Adults	395	75	256	362	0
Chronically Homeless Households	0	0	0	101	0
Veterans	0	0	49	231	0
Unaccompanied Youth	0	0	10	0	0
Data Source: Western Economic Services, Inc.					

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

Mental Health Center, Billings

a. "The HUB"

"The HUB" is a drop-in center serving both the homeless and the at-risk of becoming homeless population by acting as a resource site for individuals in the community while promoting a motivational environment. The HUB assists with information about housing, Food Stamps, SSI, SSDI, homeless shelters, health care providers and other community resources.

The HUB staff provides crisis intervention and vocational opportunities while facilitating groups designed to empower individuals by expanding their social skills and increasing their ability to become more self-sufficient. Services available include one meal a day prepared and served by HUB clients, laundry facilities, mail and phone services, access to outerwear, sleeping bags, blankets, backpacks and hygiene products. The HUB serves an average of 130 men and women daily.

b. Projects for Assistance in Transition from Homelessness or P.A.T.H.

Services through the P.A.T.H. Program are provided by a five member team of outreach liaisons. This team seeks out those unengaged adults and adolescents who experience symptoms of serious, disabling mental illness (SDMI) or serious emotional disturbance (SED) and are homeless or at risk of homelessness because of their mental illness.

The symptoms of SDMI or SED may also be combined with those of substance use disorders. Serious disabling mental illnesses are those that are chronic and impair an individual's ability to function within the normal range in at least one major area of life, i.e., unable to work, difficulty in social settings, requires help to attend to regular activities of daily living.

These homeless adults or adolescents may be found in shelters, under bridges, in caves, on the streets, in cars, "couch-surfing" with family or friends or anywhere they feel safe and can survive the elements. P.A.T.H. Outreach Liaisons visit places where the homeless live, offering them support and restoring hope that there is

a future for them. P.A.T.H. offers these individuals assistance in gaining access to sources of community support, crisis intervention and enrollment in mental health services.

Additionally, P.A.T.H. staff offer community education and orientation about mental illness; information about the issues of homelessness as well as advocating for the people they serve. The P.A.T.H. team offers advocacy, linkage, referral and short-term case management in the community.

Regular on-site access to services is made available through the P.A.T.H. program throughout the City of Billings. Positive working relationships with over 175 community groups and agencies allow the P.A.T.H. Team to assist participants in accessing a wide array of supportive services. P.A.T.H. services are available at the Mental Health Center HUB Drop-In Center located at 515 North 27th Street in Billings, Montana. P.A.T.H. services are also available at locations such as the Community Crisis Center or the Montana Rescue Mission Monday through Friday.

Western Montana Mental Health Center, Butte

a. Adult Case Management (ACM)

Adult case management services are based upon a recovery model of care defined as "an individualized process of transformation by which people move from lower to higher levels of fulfillment in areas of hope, active/growth orientation, satisfaction with social networks, control of life decisions and level of symptom interference". This service is strength based where the ability, skills, and desires of the client are the primary determinants of the ACM activity. Case management may include assessing the clients mental status, monitoring the clients ability to function in the community, supporting the client in efforts to remain stable, planning treatment goals and future needs, linking the client to needed community services, or outreach to determine the clients status and needs. Think of the case manager as the hub of the wheel and the spokes of the wheel as the client's needs for housing, benefits, job, school, legal access, medical care access, socialization opportunities, and support. The adult case management program (ACM) provides case management services to adults diagnosed with severe and disabling mental illnesses. The Butte office currently has 11 fulltime ACM's, 1 part – time case manager/ residential worker, and 1 ACM program lead/case manager. This program also provides PATH services to the homeless or at risk population that have mental illnesses. There are 2 ACM's that are designated to provide these services. This program also provides case management services to Veterans under contract with the Veteran's Administration. There are 2 ACM's that are designated to provide these services as well.

b. Share House

Share House provides residential and an integrated support service for co-occurring or dual disorders (persons who have substance use disorders as well as mental health disorders) and homeless individuals. Share House staff is on site 24 hours a day, seven days a week. The goal is to have residents become self-sufficient as they progress in their recovery. Share House services are a part of the community effort to end chronic homelessness. Share House provides a drug-free supportive living environment, case management services, life skills groups, rehabilitation aide services related to the development and utilization of life skills, coordinates referral to clinical services, employment, vocational planning, nutritional and medical care, and permanent housing. Supportive housing services are accessed by completing an admission packet and interview. Available slots are based on admission process approval. HUD Supported Housing Share House's

residential program has six beds that are designated for homeless individuals who are also chemically dependent.

The Poverello Center, Missoula

a. Healthcare for the Homeless

The Poverello Center collaborates with Partnership Health Center's Health Care for the Homeless Clinic to provide on-site medical treatment to homeless individuals and families.

Services include:

- Short-term emergency shelter
- Veterans housing and services
- Daily hot meals, sack lunches and food pantry services
- Toiletries, bathrooms, and shower facilities
- Emergency clothing and laundry services
- Mail, phone, and messaging services
- Scheduled educational classes and a computer lab
- Medical services through the Healthcare for the Homeless Clinic
- Alcoholics Anonymous and other support groups
- Community resource and referral
- Homeless outreach services
- Community outreach and educational programs

b. 211/First Call for Help

First Call for Help provides a link between dozens of non-profit organizations and people in need of their services, connecting the homeless to housing, employment, and support services across the community.

RiverStone Health, Billings

a. Healthcare for the Homeless

Designed to provide temporary medical services for homeless persons and to facilitate ongoing medical care for people who remain in the Billings area, clinics are located at sites that serve homeless individuals and families, providing routine preventive healthcare, immunizations, acute/chronic illnesses care, mental healthcare and therapy, assessment of chemical dependency, counseling, emergency dental care and financial assistance for prescriptions. Case management services are offered to assist persons in obtaining assistance through local agencies.

Lewis and Clark County

a. Healthcare for the Homeless

HealthCare for the Homeless (HCH) is a program of the Cooperative Health Center. It provides temporary medical services and case management to homeless individuals and families. Visits are by appointment or walk-in.

Missoula County

a. Healthcare for the Homeless

Eligible homeless members of the Missoula community may work with a case manager to address difficulties in accessing medical, dental, and pharmacy services.

Montana Office of Public Instruction, State of Montana (OPI)

a. McKinney-Vento - Education for Homeless Children and Youth Program

The OPI currently provides funding for EHCY programs in the following districts; Billings, Bozeman/Belgrade, Browning, Great Falls, Helena, Kalispell/Evergreen, Missoula and Sidney.

God's Love Shelter, Helena

a. Healthcare for the Homeless

God's Love Shelter offers primary health care, temporary lodging, meals, and social services.

Veteran's Affairs, Montana Health Care System, Ft. Harrison

a. The Acquired Property Sales for Homeless Providers Program

The Acquired Property Sales for Homeless Providers Program makes all VA foreclosed properties available for sale to homeless provider organizations-at a 20 to 50 percent discount-to shelter homeless Veterans.

The Supportive Services for Veteran Families (SSVF) Program provides grants and technical assistance to community-based, nonprofit organizations to help Veterans and their families stay in their homes.

b. Health Care for Homeless Veterans (HCHV) Program

VA's Health Care for Homeless Veterans (HCHV) Program offers outreach, exams, treatment, referrals, and case management to Veterans who are homeless and dealing with mental health issues, including substance use. Montana offers 436 HCHV programs for veterans to receive healthcare from trained, caring VA specialists provide tools and support necessary for Veterans to get their lives on a better track. More information is available through the VA's toll-free hotline (1-877-222-VETS (8387)) or visit the Health Care for Homeless Veterans (HCHV) Program website at http://www.va.gov/homeless/hchv.asp .

c. Homeless Patient Aligned Care Teams (H-PACTs) Program

VA's Homeless Patient Aligned Care Teams (H-PACTs) Program provides a coordinated "medical home" specifically tailored to the needs of homeless Veterans that integrates clinical care with delivery of social services with enhanced access and community coordination. Implementation of this model is expected to address many of the health disparity and equity issues facing this population and result in reduced emergency department use and hospitalizations, improved chronic disease management, improved "housing readiness" with fewer Veterans returning to homelessness once housed.

d. Homeless Veterans Dental Program

VA's Homeless Veterans Dental Program provides dental treatment for eligible Veterans in a number of programs: Domiciliary Residential Rehabilitation Treatment, VA Grant and Per Diem, Compensated Work Therapy/Transitional Residence, Healthcare for Homeless Veterans (contract bed), and Community Residential Care. VA is working to expand dental care to all eligible Veterans within this program.

e. Project CHALENG

Project CHALENG (Community Homelessness Assessment, Local Education and Networking Groups) brings together providers, advocates, and other concerned citizens to identify the needs of homeless Veterans and work to meet those needs through planning and cooperative action. This process has helped build thousands of relationships between VA and community agencies so that together they can better serve homeless Veterans.

f. Substance Use Disorder Treatment Enhancement Initiative

VA's Substance Use Disorder Treatment Enhancement Initiative provides substance use services in the community to aid homeless Veterans' recovery.

g. The Readjustment Counseling Service's Vet Center Programs

The Readjustment Counseling Service's Vet Center Programs feature community- -based locations and outreach activities that help to identify homeless Veterans and match homeless Veterans with necessary services.

Project Homeless Connect Great Falls

Project Homeless Connect Great Falls provides a range of free services to people experiencing homelessness or at risk of becoming homeless, including dental cleanings, extractions, clothing, and haircuts.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on SP-40 Institutional Delivery Structure or MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Warming Center, Bozeman

The Warming Center offers seasonal shelter to anyone in need – families with children, single adults and couples are welcome. Separate sleeping areas are provided. Trained staff and volunteers are on-site at all time during operating hours. The Center is open 7 pm to 7 am, seven days per week during the winter months.

Haven Battered Woman's Shelter, Bozeman (HAVEN)

HAVEN offers alternatives for adults and families who need a place to go when their home is no longer a safe place. HAVEN offers a 15-bed shelter where women and children can escape crisis and plan for a future free from violence. Hotels are reserved and available for male survivors, families with boys age 18 and older, and

when the shelter is at capacity. The staff offers comprehensive services including counseling, advocacy and connections to community resources.

Family Promise of Gallatin Valley, Bozeman

Family Promise of Gallatin Valley is a nonprofit network of interfaith organizations working together to end homelessness, one family at a time. The mission statement: To empower homeless families with children to achieve self-sufficiency through partnerships, services, and advocacy.

Montana Rescue Mission, Billings (MRM)

Montana Rescue Mission provides emergency, temporary care and rehabilitative services from a distinctly Christian perspective for those seeking help and solutions.

a. The Women and Family Shelter

The services offered by the Montana Rescue Mission meet women and women with children at their point of need. MRM works with them to address the root issues that brought about homelessness, including classes in parenting, life skills, anger management, proper nutrition and food preparation, conflict resolution and spiritual development. Chapel services are offered on a regular basis and staff is available for one-on-one counseling. There are real life situations that give them a chance to utilize these new skills. In addition, there are educational opportunities to improve these skills and a dedicated computer lab that can be used for resume preparation, job searches and GED preparation.

b. REACH-Out

REACH-Out is a program just for kids. It stands for Recreation, Education, Arts, Culture, and Health outside the Shelter and gives kids experiences that help them see life outside of their homelessness. Tours, museums, activities and fun take place on a regular basis. Tutoring and afterschool homework assistance is offered and all kids are supported in their classroom requirements

Butte Rescue Mission, Butte

Begun in 1972, the Butte Rescue mission serves Southwest Montana to feed, clothe, shelter and transform homeless individuals.

The Poverello Center, Missoula

The Poverello Center collaborates with Partnership Health Center's Health Care for the Homeless Clinic to provide on-site medical treatment to homeless individuals and families.

Services include:

- Short-term emergency shelter
- Veterans housing and services
- Daily hot meals, sack lunches and food pantry services
- Toiletries, bathrooms, and shower facilities
- Emergency clothing and laundry services
- Mail, phone, and messaging services

- Scheduled educational classes and a computer lab
- Medical services through the Healthcare for the Homeless Clinic
- Alcoholics Anonymous and other support groups
- Community resource and referral
- Homeless outreach services
- Community outreach and educational programs

Union Gospel Mission of Missoula, Missoula

United Gospel Mission of Missoula is a ministry to the homeless and hurting in Missoula.

a. The Day Center

The Day Center provides basic needs to the homeless and needy: restrooms, clean water, the use of a phone, bus passes, toiletries, rides to local churches, movies and friendship.

b. The Women & Children's Shelter

The Women & Children's Shelter is open each night for women with children and for single women. Daily shuttle transportation is provided to and from the shelter, with overnight lodging and home-cooked meals, while families are supported in goal setting and in pursuing available housing options and opportunities to grow socially and spiritually. Onsite staff and volunteers serve up good food and great fellowship. Women and children of any faith background are welcome, with the understanding that this and all Mission programs are founded and operated with a Christian world view.

A Ray of Hope, Kalispell

A Ray of Hope provides a safe harbor for those in the community with nowhere else to turn. Those who seek help are provided with food, clothing, shelter and most importantly, job training which provides an avenue to develop competency in meeting life's financial, emotional, family, legal and rehabilitation challenges.

Samaritan House, Kalispell

Samaritan House is a homeless shelter and transitional living program in Kalispell, Montana. The mission of the Samaritan House is to provide shelter and basic needs for homeless people, while fostering self-respect and human dignity.

Rescue Mission, Great Falls

Great Falls Rescue Mission is a non-profit Christian organization committed to caring for hungry, hurting and homeless men, women and children of North Central Montana.

a. Men's Ministries

In addition to shelter, every man is provided with help in finding a job, seeking housing, spiritual counsel, life skill classes, accountability and friendship.

b. Women and Families Shelter

Providing shelter, care, counseling and a place of safety for women, children and families.

c. Food Ministries

Great Falls Rescue Mission serves 3 meals a day.

d. Clinic Ministry

Dental, chiropractic, optical and legal clinics are offered at no charge to those who are homeless or on low or limited incomes. These services are provided by volunteer professionals in the area. Medical clinics are provided by a local doctor, a family nurse practitioner and MSU nursing students.

The Friendship Center, Helena

The Friendship Center provides a safe shelter and a broad range of support services at no charge for anyone who has suffered domestic violence, sexual assault, dating violence or stalking.

God's Love, Helena

God's Love Shelter offers primary health care, temporary lodging, meals, and social services.

YWCA, Helena

a. Women's Shelter

The YWCA provides transitional housing services for up to 33 women and their daughters at any given time through the "WINGS" program. Each woman has a furnished bedroom and shares common bathrooms, kitchen, and common areas. The YWCA provides an entry point for women transitioning from homelessness to permanent housing. "WINGS" (a transitional housing program) is in an intensive, research based program requiring a 6- to 24-month stay, case management services, a minimum of 20 hours work per week, goal setting, and life skills classes.

b. The Placer Pantry

The Placer Pantry provides basic toiletries to anyone in the community in need. Individuals may "shop" for the items they need on a monthly basis based on the size of their family and the products on hand. The Pantry serves people who are employed and unemployed, housed and homeless

Family Promise of Helena, Helena

Family Promise provides a home-like environment. Families have a place to stay, home cooked meals, transportation, and an advocate to help them get back on their feet. The Family Promise Day Center is equipped much like a home: laundry, showers, kitchen, computers, phone, space for kids to nap, etc.

Good Samaritan, Helena

Good Samaritan Ministries serves as the social justice arm of the Diocese of Helena and Helena's four Catholic parishes. Good Samaritan Ministries, motivated by Catholic social teaching, works in the community to advance family life, human dignity and the common good. They provide services to meet the physical, social, emotional and spiritual needs of individuals and families of all faiths, especially those most in need. The types

of assistance provided include: diapers/formula, clothing, household items, furniture, rental assistance, auto repair, utilities/ propane, gasoline, medical prescriptions, eyeglasses, and childcare.

Good Samaritan also serves as a vocational training site for many employees and volunteers, offering a structured work environment that helps individuals build self-esteem and prepare them to move on to other positions in the community.

St. Vincent dePaul, Billings

The Society of St. Vincent de Paul is the largest lay organization within the Catholic Church. The Billings Society has been actively serving the poor with the following ministries: baby basics, educational certification program, holiday food baskets, refurbished electronics for students, and Toys for Tots.

New Life Mission, Poplar

The New Life Mission is a food pantry providing food assistance.

Tumbleweed & Montana Foster Care Independence Program, Yellowstone County

The Tumbleweed Runaway Program Inc, administers HopeLink (a youth Transition-in-Placement program). The mission for the program is to support youth in their transition from homelessness to successful independent living by promoting healthy choices and strengthening individual resources. Tumbleweed further aims to prevent poverty and homelessness among the growing — yet largely overlooked –population of youth who are highly vulnerable to homelessness.

HopeLink utilizes a comprehensive model to effectively promote youth success in the key areas required for healthy adulthood — independence, permanent housing, employment, life skills and self-reliance — areas that will significantly change the course of a youth's life.

Valor House, Missoula; Housing MT Heroes

The Valor House and Housing MT Heroes are transitional housing programs for homeless veterans whose goal is working towards stable housing. Both programs seek to assist homeless veterans in need, including elderly, disabled, and Native American veterans, and those coping with mental illness and substance abuse. Participating residents will identify personal goals focusing on housing and stability; increasing skills and income; and improving self-determination.

Watson's Children's Shelter, Missoula

Janice Joseph Watson opened Jack and Jill Nursery and Day Care in 1968 after retiring as an elementary school teacher. Police and child protection social workers had few alternatives when they needed a place for children who were abandoned, abused, neglected or whose parents were incarcerated. The two shelters at Watson's are designed to provide a safe, comfortable and welcoming environment for children.

Western Montana Community Mental Health Center, Kalispell

Kalispell Safe House crisis stabilization facility is available to provide a least restrictive level of care in the community when a client is experiencing an acute psychiatric crisis, in imminent risk of psychiatric hospitalization, in need of medication adjustment, and/or in need of 24 hour supervision to maintain safety

and avoid hospitalization. Client referrals must be at least 18 years of age and must receive prior authorization from the State of Montana Addictive and Mental Disorders Division (AMDD) or their utilization review contractor, First Health. It is the responsibility of the crisis stabilization staff to facilitate the prior authorization process. Referrals are usually made by a member of the clients treatment team and/or a mental health professional who recommends this level of care. Generally, admissions to crisis facilities are for clients who voluntarily agree to comply with admission criteria and to cooperate with treatment recommendations

Youth Homes, Missoula

The mission of Youth Homes is to help every youth feel safe, have a sense of belonging and find a place to call home." Youth Homes prepares children with tools for self-reliance because kids aging out of the foster care system without a permanent family are three times more likely to drop out of school and become homeless within one year of moving out on their own.

Mountain Home Montana, Missoula

A nonprofit in Missoula where young mothers between the ages 16-24 who are pregnant and/or parenting may access housing, supportive services, and mental health services. MHM helps vulnerable young families with their basic needs, including safety, shelter, food, educational and employment opportunities, and access to mental health therapy and medical care by utilizing best practices to provide individualized support and case management that teach our moms the parenting and life skills necessary for independent living.

Florence Crittenton, Helena

Florence Crittenton provides innovative, comprehensive services and nurturing programs that engage and empower children, young adults and young families to thrive and build productive lives. Florence Crittenton's Residential Program and Community Services are aimed at wrapping services around young families and providing them with the tools & support needed to be successful. Their philosophy is that the organization has the opportunity to change the parenting behavior of these young parents, but also positively affect the outcomes of the next generation in their babies.

Salvation Army Men's Transitional House, Helena

The Salvation Army's program helps transition men into stabilized living including education for life skills, money management, budgeting, how to seek and secure employment, and weekly case management. Currently, there are no programs that specifically transition single men back into society. Helena has a men's shelter program, but this is temporary emergency housing, not a transition into stable living. This program is looking to expand the current Transitional Housing Program, which predominately has been for families, to incorporate single men on a larger level.

Family Promise of Yellowstone Valley

Family Promise is an organization dedicated to facilitating the long-term rehabilitation of homeless families. Family Promise is a ministry of local faith communities to homeless families in the Billings area. These faith communities take turns hosting homeless families at their congregations every 10-12 weeks. Together, they mobilize community resources: houses of worship for lodging, congregations for volunteers, social service agencies for assessment and referrals, and existing facilities for day programs. Nationally, 80 percent of the families that Family Promise serve go on to long-term housing.

The Community Café, Bozeman

The Community Café is part of HRDC's Emergency Food and Nutrition Initiative, striving to improve food security throughout the Gallatin Valley. The Café provides a restaurant style dinner service to anyone who eats regardless of their ability to contribute, operating on a pay what you can model, allowing those who can contribute to pay it forward for others who cannot. In 2014, the Café provided over 50,000 dinners. The Café provides delicious, family-friendly meals 7 days a week from 5 pm-7 pm, 365 days a year.

Community Action Partnership of Northwest Montana, Kalispell (CAPNM)

CAPNM partners with the Samaritan House to sponsor the annual Flathead Valley Project Homeless Connect (PHC) each June. Over 40 local agencies and businesses partner to aid the homeless and impoverished in one convenient location. CAPNM knows that homelessness and poverty are serious needs in Flathead Valley, with approximately 500 people homeless and 45% of those individuals are families with children. Other community needs that PHC addresses are hunger, knowledge of employment and education opportunities, knowledge of affordable housing options, as well as assistance with attaining medical services, dental services and public assistance. The direct services offered at the event are free Medical and Dental Services, Financial and Employment Assistance, Pet Services, ID Services, Haircuts, Veterans Services, Legal Assistance, Financial Education Information, Public Assistance, Vision Services, Housing Counseling, Senior Services, Bicycle Repair, Food Baskets, etc.

YWCA, Missoula

a. Ada's Place Transitional

This 18-month program is designed to help homeless survivors of domestic violence and their children work toward self-sufficiency and independence. Ada's Place offers participants the opportunity to gain knowledge, education, and skills in a variety of areas while working on goals that will assist them in obtaining permanent housing and achieving economic security.

b. Gateway Assessment Center

A short-term assessment, referral, and supportive services program located at the Salvation Army (339 W. Broadway). The program offers YWCA case management and short-term motel stays for homeless families.

c. Rapid Re-Housing Program

This program offers rent and deposit assistance as well as support services for homeless families in Missoula County.

d. Ada's Place Emergency Housing

This 50-day emergency housing program is available for homeless one and two parent families who are committed to seeking stable, permanent housing.

Senior Community Service Employment Program, Montana Department of Labor and Industry (SCSEP)

SCSEP can link senior homeless persons to help with rent, child care, utilities deposits, transportation, health and dental assistance along with providing employment assistance.

Community action agency education and employment resources

General Education Development (GED)

General Education Development (GED) diploma counseling and training is available. Having an education, even a high school one, can help break the poverty cycle. That GED is a key to pursuing further higher education, such as a college degree. It can also place people onto a career path and ideally allow them to generate a sustainable income. Certified Alternative Education Instructors provide students one-on-one, self-paced instruction classes.

Montana Subsidized Employment Program (SEP)

The Montana Subsidized Employment Program (SEP) can provide job development and employment opportunities for individuals who have been laid-off, are unemployed, have, had a reduction in hours, or are under-employed. This is offered for low income individuals or those facing poverty in Montana.

Summer Youth Employment & Training resource

The Summer Youth Employment & Training resource was created to provide struggling and low-income youth the opportunity to work during the summer months. Among other things it will provide them with job- readiness training, work experience, and soft skills while getting paid.

Supplemental Nutrition Assistance Program Employment and Training

Many Montana community action agencies also offer the Supplemental Nutrition Assistance Program Employment and Training. This will help people that are on food stamps achieve their long term self- sufficiency goal. The non-profit works with partners to facilitate opportunities for education, work experience and job retention training activities. One-on-one support is provided to clients from customized case management services, all of which can assist with overcoming obstacles which prevent individuals from becoming employed.

Temporary Assistance for Needy Families (TANF)

Similar to above, the Work Readiness Component is for Montana individuals who are receiving Temporary Assistance for Needy Families (TANF). The program can help them with their pursuit of self-sufficiency. The community agency will offer opportunities for job readiness training and other services.

Youth Employment

Youth Employment for Participants is another option for low-income youth and teenagers that range in age from 14-21. It can assist those that are school drop outs, pregnant or parenting, youth with a criminal history, and those with little experience or education. The disabled may also benefit from this resource.

Montana State Workforce Investment Board - One-Stop Services

All of the workforce programs that are offered in Montana work together to serve all of the targeted populations. A customer that is part of one targeted population, regardless of the specifics, may be served by one or more of the workforce programs. For example, a homeless veteran could be served by WIA Adult, WIA

Dislocated Worker and the veteran program through one or more agencies. Co-enrollment into the various programs with different operators is expected throughout the state to leverage resources for participants.

Other

Other general employment and training resources can assist clients in starting or advancing a career. The services include On the Job Training, Career Guidance, Case Management, GED Referral, Education Assistance, Occupational Skills, and Job Search Instruction.

Homeless Special Needs Assessment

Table MA-30.A shows the number of facilities and housing targets in Montana. There are currently 351 year-round emergency shelter beds needed for households with adults and children, and 395 year round emergency shelter beds needed for households with only adults.

Table MA-30.A – Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Needs		*Transitional Housing Beds*	*Permanent Supportive Housing Beds*	
	Year Round Beds (Current & New)	*Voucher/ Seasonal/ Overflow Beds*	*Current & New*	*Current & New*	*Under Development*
Households with Adult(s) and Child(ren)	351	65	335	304	0
Households with Only Adults	395	75	256	362	0
Chronically Homeless Households	0	0	0	101	0
Veterans	0	0	49	231	0
Unaccompanied Youth	0	0	10	0	0
Data Source: DPHHS					

MA-35 Special Needs Facilities and Services

Introduction

With the aging of the Baby Boomers there will be an increased need for senior housing in the coming years, which could result in the increased need for special needs facilities and services. The current amount of senior housing remains inadequate to keep up with the demand for these units throughout the state and this trend will continue.

The Consolidated Plan noted that is a significant need for special needs housing. Persons with mental health disorders, disabilities, or homeless populations are discussed in other sections demonstrating need. Additionally, as is evident through the utilization of resources within the HOPWA Assistance listed below, persons living with HIV/AIDS need continued assistance for housing, utilities, and rental assistance.

Table 42 provides default data based on reports submitted by the State for the HOPWA Program. The numbers indicated in Table 42 are primarily estimates.

Table 40 – HOPWA Assistance Baseline Table

Type of HOPWA Assistance	*Number of Units Designated or Available for People with HIV/AIDS and their families*
TBRA	99
PH in Facilities	0
STRMU	48
ST or TH facilities	0
PH placement	147
Data Source: Western Economic Services, Inc.	

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

The Montana Department of Public Health and Human Services (DPHHS) works with the MTCoC to leverage resources and provide increased and coordinated services across the state.

Activities include rental assistance, financial assistance of rental application fees, security and utility deposits and payments, case management, housing search and support for toll free telephone referral hotlines for domestic abuse and other homeless individuals and families; and referral to mainstream resources; assistance to shelters for the homeless and victims of domestic and sexual violence, youth homes, and food banks.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

The Montana Home Choice Coalition (Coalition) provides quality community-based services to persons with challenging mental, emotional, and in some cases, physical needs who would otherwise be served in a more restrictive setting or not at all. The Mental Health Oversight Advisory Council (Council) works to create a mental health system that effectively serves families and individuals throughout Montana, including programs for housing, employment, education, and socialization.

Funds for transitional housing, permanent supportive housing, and rapid rehousing across Montana are available on a competitive basis through the state's Continuum of Care (MTCoC) process. Each of the twelve regional MTCoC districts housed within the state's ten Human Resource Development Councils provides specific services of crisis stabilization and housing supports for veterans, unaccompanied youth, families with children, and chronically homeless individuals and families.

The State of Montana will continue to encourage activities that address the housing needs of those returning from mental and physical health institutions receive appropriate supportive housing.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e).

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 those at risk of

homelessness, and encourage the development and rehabilitation of non-rental facilities for the shelter and transition of temporarily homeless Montanans.

Montana will continue to support effort by local governments and partner organizations providing HIV services, substance abuse services, disability services, aiding victims of domestic violence, and assisting the disabled.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Not Applicable – not an entitlement/consortia grantee.

MA-40 Barriers to Affordable Housing

Negative Effects of Public Policies on Affordable Housing and Residential Investment

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 living with HIV and their families. 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 2014 Housing and Community Development Needs Survey indicated the highest need for persons with severe mental illness, followed by veterans and the frail elderly.

According to HUD, special needs populations are "not homeless but require supportive housing, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify."[48] Because individuals in these groups face unique housing challenges and are vulnerable to becoming homeless, a variety of support services are needed in order for them to achieve and maintain a suitable and stable living environment. Each of these special needs populations will be discussed in terms of their size and characteristics, services and housing currently provided, and services and housing still needed.

A portion of the 2014 Housing and Community Development Survey asked respondents to rank the need for services and facilities for non-homeless special needs groups in Montana. The responses to this question are tabulated in Table MA-40.A. While most special needs groups were perceived to have a high level of need, persons with severe mental illness were perceived as having the highest level of need. Veterans and the frail elderly were also identified as having high levels of need for facilities services.

Table MA-40.A - Rated Need for Services and Facilities for Special Needs Groups

Question	*No Need*	*Low Need*	*Medium Need*	*High Need*	*Missing*	*Total*
Persons with severe mental illness	3	18	41	78	104	244
Veterans	2	11	53	75	103	244
The frail elderly (age 85+)	3	11	53	72	105	244
Homeless persons	6	27	37	70	104	244
Victims of domestic violence	4	12	57	64	107	244

[48] *Consolidated Plan Final Rule 24 CFR Part 91.* United States Department of Housing and Urban Development. Community Planning and Development. 1995. 14.

The elderly (age 65+)	4	10	63	62	105	244
Persons with substance abuse addictions	5	19	54	60	106	244
Persons with physical disabilities	5	16	60	55	108	244
Persons with developmental disabilities	3	18	69	48	106	244
Persons recently released from prison	8	34	55	39	108	244
Persons with HIV/AIDS	10	50	56	18	110	244
Other groups	4			1	239	244
Data Source: 2014 Housing and Community Development Survey						

Elderly and Frail Elderly Persons

HUD provides a definition of "elderly" as persons age 62 or older. The U.S. National Center for Health Statistics (NCHS) notes that a number of older citizens have limitations caused by chronic conditions that constrain activities of daily living (ADLs). ADLs are divided into three levels, from basic to advanced. Basic ADLs involve personal care and include tasks such as eating, bathing, dressing, using the toilet, and getting in or out of bed or a chair. Intermediate, or instrumental, Activities of Daily Living (IADLs) are tasks necessary for independent functioning in the community. These include cooking, cleaning, laundry, shopping, using the telephone, using or accessing transportation, taking medicines, and managing money. Social, recreational and occupational activities that greatly affect the individual's quality of life are Advanced Activities of Daily Living (AADL). Playing bridge, bowling, doing crafts, or volunteering for one's church are examples of advanced ADLs. "Frail elderly" is defined as persons who are unable to perform three or more activities of daily living.[49]

Size and Characteristics

According to 2010 Census Bureau data, 146,742 residents in the State of Montana were age 65 or older, which equated to about 14.8 percent of the total population. Table MA-40.B presents a breakdown of the elderly population by age in Montana at the time of the 2010 census. While elderly is defined as persons over 62, "extra elderly" persons are those over the age of 75. Within the elderly population in Montana, 45.0 percent were extra elderly. According to the State of Montana's Aging Services Unit, by the year 2025 Montana will have the fifth highest per capita older population in the United States.[50] The elderly population in Montana grew 21.3 percent between 2000 and 2010. The two age groups with the greatest growth over this decade were those ages 65 to 66, with 49.2 percent growth, and those aged 67 to 69, with 38.8 percent growth.

Table MA-40.B - Elderly Population by Age

Age	*2000 Census*		*2010 Census*		*% Change 00–10*
	Population	*% of Total*	*Population*	*% of Total*	
65 to 66	13,279	11.0%	19,811	13.5%	49.2%
67 to 69	19,262	15.9%	26,745	18.2%	38.8%
70 to 74	29,978	24.8%	34,186	23.3%	14.0%
75 to 79	24,703	20.4%	25,637	17.5%	3.8%
80 to 84	18,390	15.2%	20,342	13.9%	10.6%
85 or Older	15,337	12.7%	20,021	13.6%	30.5%
Total	120,949	100.0%	146,742	100.0%	21.3%
Data Source: 2000 & 2010 Census SF1 Data					

[49] http://law.justia.com/us/cfr/title24/24-4.0.2.1.12.2.3.2.html
[50] http://www.dphhs.mt.gov/sltc/services/aging/Newsletter/2012May.pdf

Services and Housing Currently Provided

The Older Americans Act of 1965 has been the main instrument for delivering social services to senior citizens in the United States. This Act established the federal Administration on Aging (AoA) and related state agencies to specifically address the many needs of the elderly population nationwide. Despite limited resources and funding, the mission of the Older Americans Act is broad: "to help older people maintain maximum independence in their homes and communities and to promote a continuum of care for the vulnerable elderly. "[51] The AoA encompasses a variety of services aimed at the elderly population, such as supportive services, nutrition services, family caregiver support, and disease prevention and health promotion.

In Montana, support for the elderly population is provided by the Senior and Long Term Care Division, and the Aging Services Unit, within the State's Public Health and Human Services Department. This State unit administers a wide variety of senior based services for residents over age 60, with the goal to provide services that allow seniors to remain independent.[52] The unit's programs and services include adult protective services, long term care resources, information and referral services, legal resources, community resources, and financial planning.

The *2012-2105 Montana State Plan on Aging* outlines the fundamental concerns facing Montanans as the population continues to age.[53] *Montana's State Plan on Aging* includes the following goals:

- Goal 1: To Strengthen the core services provided by Montana's Aging Services Network, especially in our frontier areas of Montana.
- Goal 2: Expand Aging and Disability Resource Center (ADRC) coverage in Montana by 2015.
- Goal 3: Continue developing a sustainable Legal Services Developer Program to enhance access to legal assistance, support and education to Montana's elders.
- Goal 4: Strengthen and expand the Ombudsman program to meet the increased growth in the number of facilities and the ever changing and challenging needs of the residents.
- Goal 5: Coordinate with the Aging and Disabilities networks to look at enhancing and further develop the service delivery system to improve and increase services, especially in frontier areas of Montana.

Services and Housing Needed

While there are a number of different housing and service programs that aid the elderly population in Montana, the general population is continuing to age and live longer, which will require additional services and resources to meet the ever growing needs of the elderly. The *Montana State Plan on Aging* identifies various needs for the elderly, including care/case management, caregiving support, elder abuse prevention, employment, health care/health/mental health, health insurance, health promotion, housing, and others. The DPHHS also indicated that in 2007, 35.6 percent of clients utilizing in-home services were living in poverty.[54]

According to the Center for Housing Policy, housing will be a priority need for the elderly population. A growing number of older households will face severe housing costs burdens, and many will require assisted or long-term care housing and services.[55] In addition, as the Baby Boomer generation continues to grow, many will prefer to remain independent, requiring in-home services and adaptions to existing homes. Thus, there is a greater focus on in-home care and expanded home health services to meet the needs of a more independent elderly population.

[51] http://www.nhpf.org/library/the-basics/Basics_OlderAmericansAct_02-23-12.pdf
[52] http://www.dphhs.mt.gov/sltc/services/aging/index.shtml
[53] http://www.dphhs.mt.gov/sltc/services/aging/StatePlanAging/StatePlanFinal2011.pdf
[54] http://www.dphhs.mt.gov/sltc/services/aging/Reports/2007AgingReport.pdf
[55] Lipman, Barbara., Jeffery Lubell, Emily Salmon. "Housing an Aging Population: Are We Prepared?" *Center for Housing Policy* (2012). 21 May 2014 <http://www.nhc.org/media/files/AgingReport2012.pdf>.

Because most elderly persons are on a fixed income, these increasing costs may fall on publically funded programs in the state.

People with Disabilities (Mental, Physical, Developmental)

HUD defines a person with a disability as any person who has a physical or mental impairment that substantially limits one or more major life activities. Physical or mental disabilities include hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS related complex, and mental retardation that substantially limits one or more major life activities. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks and caring for oneself.[56] HUD defers to Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 for the definition of developmental disability: a severe, chronic disability of an individual that is attributable to a mental or physical impairment or combination of mental and physical impairments.

Many persons with disabilities require support services in order to maintain healthy lifestyles. The services that are required often depend on the individual and the type of disability. For example, a person with a mental disability may require medication assistance, weekly counseling sessions or job placement assistance. Specialized transport services and physical therapy sessions are services that might be required for a person with a physical disability.

Many people with disabilities live on fixed incomes and thus face financial and housing challenges similar to those of the elderly. Without a stable, affordable housing situation, persons with disabilities can find daily life challenging. In addition, patients from psychiatric hospitals and structured residential programs have a hard time transitioning back in to mainstream society without a reasonably priced and supportive living situation. The U.S. Conference of Mayors *2013 Hunger and Homeless Survey* found that mental illness was cited 44 percent of the time as a cause of homelessness among unaccompanied individuals. Likewise, they reported that 30 percent of homeless adults in their cities had severe mental illness.[57]

Size and Characteristics

Data from the *2012 Five-Year American Community Survey for Montana* showed a total population of persons with disabilities of 127,803, with an overall disability rate of 13.1 percent. Table MA-40.C presents a tally of disabilities by age and gender. The age group with the highest disability rate is persons aged 75 and older. Males had a slightly higher disability rate at 13.9 percent, than females, at 12.3 percent. Children under 5 had the lowest disability rate, at less than one percent for both males and females.

Table MA-40.C - Disability by Age & Gender

Age	*Male*		*Female*		*Total*	
	Disabled Population	*Disability Rate*	*Disabled Population*	*Disability Rate*	*Disabled Population*	*Disability Rate*
Under 5	155	.5%	188	.6%	343	.6%
5 to 17	5,059	6.1%	3,188	4.1%	8,247	5.1%
18 to 34	7,481	6.9%	5,467	5.3%	12,948	6.1%
35 to 64	28,874	14.6%	24,357	12.2%	53,231	13.4%
65 to 74	12,068	30.2%	8,913	22.1%	20,981	26.1%
75 or older	14,191	52.2%	17,862	50.2%	32,053	51.1%
Total	67,828	13.9%	59,975	12.3%	127,803	13.1%
Data Source: 2012 Five-Year ACS Data						

[56] http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/inhousing
[57] http://www.usmayors.org/pressreleases/uploads/2013/1210-report-HH.pdf

Table MA-40.D breaks down disabilities by disability type for persons aged 5 and older, from the 2000 census data. The most common disability is a physical disability, followed by an employment disability. The third most common disability type is a mental disability.

Table MA-40.D - Total Disabilities Tallied: Aged 5 and Older

Disability Type	*Population*
Sensory disability	36,572
Physical disability	71,541
Mental disability	41,086
Self-care disability	17,107
Employment disability	53,146
Go-outside-home disability	39,271
Total	258,723
Data Source: 2000 Census SF3 Data	

Services and Housing Currently Provided

In 2010, the Disability Services Division of the DPHHS changed its name to the Developmental Services Division. The Developmental Disabilities Program contracts with private, non-profit corporations to provide services across the lifespan for individuals who have developmental disabilities and their families. The focus of the program is to tailor care to the individual and provide it in as natural environment as possible. [58] The Montana Development Center is administered by the Developmental Services Division and is the State's only residential facility for individuals with developmental disabilities that provides 24-hour care for those with the most severe behaviors or severe self-help deficits.

Services and Facilities Needed

The Housing and Community Development Survey also asked participants to rank the need for services and facilities for persons with disabilities. The results, shown in Table MA-40.E, indicate a strong need for housing for both persons with physical disabilities and developmental disabilities, with over 45 percent of respondents indicating a medium to high level of need for services and facilities for both groups.

Table MA-40.E - Rated need for services and facilities for special needs groups

Question	*No Need*	*Low Need*	*Medium Need*	*High Need*	*Missing*	*Total*
Persons with physical disabilities	5	16	60	55	108	244
Persons with developmental disabilities	3	18	69	48	106	244
Data Source: 2014 Housing and Community Development Survey						

People with Alcohol or other Drug Addictions

According to the National Coalition for the Homeless, for persons "just one step away from homelessness, the onset or exacerbation of an addictive disorder may provide just the catalyst to plunge them into residential instability."[59] For persons suffering from addictions to drugs and alcohol, housing is complicated. Persons who have stable housing are much better able to treat their addictions. However, obtaining stable housing while suffering from addiction can be quite difficult, and the frustrations caused by a lack of housing options may only

[58] http://www.dphhs.mt.gov/dsd/index.shtml
[59] http://www.nationalhomeless.org/publications/facts/addiction.pdf

exacerbate addictions. According to the *2013 U.S. Conference of Mayors Hunger & Homelessness Report*, substance abuse is one of the most cited causes of homelessness.[60]

Size and Characteristics

The DPHHS published the *2012 Montana Prevention Needs Assessment Survey* that was conducted in schools across the state to evaluate adolescent substance abuse.[61] The state as a whole saw a decline in adolescent alcohol use from almost 50 percent of survey respondents indicating they had ever used alcohol in 2008 to closer to 44 percent in 2012. Other adolescent drug was also reported in this document. The Addictive and Mental Disorders' Chemical Dependency Bureau also provided data on chemical dependency treatment and prevention activities by county.[62] Each county had varying levels of drug use and treatment. In addition, the Trust for America's Health found that Montana had the 21st highest drug overdose mortality rate in the United States in 2013, with 12.9 per 100,000 people suffering drug overdose fatalities.[63] The report found that the majority of overdose death, a majority of which were from prescription drugs, had doubled in Montana since 1999.

Services and Housing Currently Provided

Addictive and Mental Disorders Division (AMDD) is the designated state adult mental health agency for the DPHHS. The mission of AMDD is to implement and improve an appropriate statewide system of prevention, treatment, care, and rehabilitation for Montanans with mental disorders or addictions to drugs or alcohol.

Through the Chemical Dependency Bureau, AMDD assesses the need for chemical dependency treatment and prevention services throughout Montana. Those services are available through contracts with 20 state-approved programs that practice a co-occurring approach to treatment. The bureau reimburses for a full range of outpatient and inpatient services, as well as education programs for DUI offenders and youth charged as a Minor in Possession. The Chemical Dependency Bureau also organizes and funds activities designed to prevent the use of alcohol, tobacco, and other drugs by youth and the abuse of those substances by adults. People with substance abuse disorders who have family incomes below 200% of the federal poverty level are eligible for public funded treatment services. In addition, the Medicaid program funds outpatient and residential chemical dependency treatment for adults and adolescents who are Medicaid eligible.

The Montana Chemical Dependency Center, located in Butte, is the only in-patient chemical dependency treatment center administered by the state. It has 16 treatment beds for men, 16 treatment beds for women, and 16 beds for withdrawal management.[64]

Services and Housing Needed

According to the Healthy People 2020 national objectives, there were 22 million Americans struggling with a drug or alcohol problem in 2005. Of those with substance abuse problems, 95 percent are unaware of their problem.[65] Obtaining treatment is a primary concern for many, which often includes high costs and other impacts on the person's ability to obtain or retain an income and housing.

[60] http://www.usmayors.org/pressreleases/uploads/2013/1210-report-HH.pdf
[61] http://prevention.mt.gov/pna/2012/01.%20State%20Data/State%20of%20Montana%20Profile%20Report.pdf
[62] http://www.dphhs.mt.gov/amdd/chemicaldependencyservices/documents/countysnapshots.pdf
[63] http://healthyamericans.org/reports/drugabuse2013/release.php?stateid=MT
[64] http://www.dphhs.mt.gov/mcdc/
[65] http://www.healthypeople.gov/2020/TopicsObjectives2020/overview.aspx?topicId=40#star

The National Coalition for the Homeless notes that other needs for persons living with addictions to drugs or alcohol include transportation and support services, including work programs and therapy access. Barriers also include programs that follow abstinence-only policies. These programs are often unrealistic for persons suffering from addictions because they fail to address the reality of relapses. A person living in supportive housing with an addiction problem who experiences a relapse may suddenly become a homeless person.[66]

Results from the 2014 Housing and Community Development Survey, presented in Table MA-40.F, show that respondent indicated a high need level for additional services and facilities for this special needs group.

Table MA-40.F - Rated need for services and facilities for special needs groups

Question	*No Need*	*Low Need*	*Medium Need*	*High Need*	*Missing*	*Total*
Persons with substance abuse addictions	5	19	54	60	106	244
Data Source: 2014 Housing and Community Development Survey						

Victims of Domestic Violence

Domestic violence describes behaviors that are used by one person in a relationship to control the other. This aggressive conduct is often criminal, including physical assault, sexual abuse and stalking. The U.S. Department of Justice defines domestic violence as a pattern of abusive behavior in any relationship that is used by one partner to gain or maintain power and control over another intimate partner.[67] Victims can be of all races, ages, genders, religions, cultures, education levels and marital statuses. Victims of domestic violence are at risk of becoming homeless due to an unstable living environment (Table MA-40.G). If domestic violence victims flee the home, they are often faced with finding emergency shelter and services for themselves and their children. Victims of domestic violence are predominantly women. However, children can also be affected as either victims of abuse or as witnesses to abuse. The U.S. Department of Justice found that throughout their lifetime, over 25 million women and 7 million men were victimized by an intimate partner.[68]

Table MA-40.G - Victims of Domestic Violence

Gender	*Count of Respondents*	*Count of Respondents and Family*
Males	15	19
Female	117	273
Missing or N/A	1	2
Total	133	294
Data Source: Montana Homeless Survey		

Size and Characteristics

Pinpointing a specific number of victims of domestic violence can be difficult because many cases go unreported. However, there are other means of gathering statistics, including tracking the numbers of cases that are reported to law enforcement. According to the National Coalition Against Domestic Violence, there were 11,562 victims of domestic violence in 2003, with 11 homicides noted to be a result of domestic violence.[69]

The 2013 Montana Homeless Survey indicated 294 victims of domestic abuse. Of these survey respondents and their families, 92.9 percent were female. Victims of domestic violence accounted for 6.5 percent of Montana's

[66] http://www.nationalhomeless.org/publications/facts/addiction.pdf
[67] http://www.ovw.usdoj.gov/domviolence.htm
[68] https://www.ncjrs.gov/pdffiles1/nij/183781.pdf
[69] http://www.ncadv.org/files/Montana%202.09.pdf

homeless population in the 2013 Point-in-Time count. During a portion of the public input meetings, the Montana Department of Commerce received additional comments about homelessness and domestic violence:

- 50 percent of cities surveyed cite domestic violence as a primary cause of homelessness (US Conference of Mayors, 2005)
- Approximately 63 percent of all homeless women have experienced domestic violence (National Network to End Domestic Violence)
- One in three women will experience domestic or sexual abuse in her lifetime; one in four women will experience severe physical violence (World Health Organization, 2013)[70]

Services and Housing Currently Provided

The Montana Coalition Against Domestic & Sexual Violence is a statewide coalition of individuals and organizations working together to end domestic and sexual violence through advocacy, public education, public policy, and program development. The Coalition's goals are to eliminate all forms of oppression, to provide support, network opportunities and training, and to encourage increased awareness and understanding[71].

Services for victims of domestic abuse are provided by a variety of non-profit and faith-based organizations across the state. Many of the shelters have 24-hour crisis lines and offer temporary housing, advocacy, referral programs, counseling, and transportation, as well as many other services. A partial list of domestic violence service providers is shown in Table MA-40.H.

Table MA-40.H - Service Providers for Victims of Domestic Violence

Homeless Service Organization	***Counties Served***
Rosebud & Treasure County Victim Witness Program	Rosebud, Treasure
Women's Resource Center of Glasgow	Valley, Daniels, Sheridan, Philips, Roosevelt
Dawson County Domestic Violence & Sexual Assault Program	Dawson, Wibaux, Prairie
Phillips County Domestic Violence Program	Phillips
Custer Network Against Domestic Abuse & Sexual Assault	Custer, Rosebud, Treasure, Garfield, Powder River
Richland County Coalition Against Domestic Violence	Richland & McCone
The Family Violence Resource Center	Richland & McCone
The Family Violence Resource Center	Fort Peck Reservation
Northeast Montana Victim/Witness Program	Phillips, Valley, Roosevelt, Sheridan, Daniels Counties
Billings Area Family Violence Task Force	Yellowstone
YWCA Billings – Gateway	Yellowstone, Carbon, Stillwater, Big Horn, Rosebud and Musselshell
Tri-County Victim/Witness Program	Stillwater, Sweet Grass, Carbon
Crow Victims Assistance Program	Crow Reservation
Healing Hearts	Northern Cheyenne Reservation
Tri-County Network	Meagher, Park, Sweet Grass
Custer Network Against Domestic Abuse & Sexual Assault (CNADA)	Custer, Carter, Fallon, Garfield, and Powder River
Domestic and Sexual Violence Services of Carbon County	Carbon and Stillwater
Rocky Mountain Victims Program	Blackfeet Reservation
Hi-Lines Help for Abused Spouses	Chouteau, Glacier, Toole, Teton, Pondera, Liberty
Mercy Home	Cascade, Toole, Pondera, Teton, Glacier, Chouteau, Judith Basin, Meagher, Liberty
Fergus County Attorney Victim Assistance Program	Fergus, Petroleum, Judith Basin
Gallatin County Victim Assistance	Gallatin County and the City of Bozeman

[70] Erica Aytes Coyle, Interim Co-Director/Development Director, HAVEN (27 May 2014)
[71] http://mcadsv.com/about/philosophy/

HAVEN	Gallatin, Madison, Meagher
Women's Resource Center/Community Support Center	Beaverhead & Madison
SAFE	Ravalli
The Abbie Shelter	Flathead
Mineral County Help Line	Mineral
Sanders County Coalition for Families	Sanders
Friendship Center	Lewis & Clark County
Data Source: Montana Coalition Against Domestic Violence	

Services and Housing Needed

Results from the 2014 Housing and Community Development Survey indicated a medium to high need level for additional domestic violence facilities and services in Montana. These data are shown in Table MA-40.I.

Table MA-40.I- Rated Need for Services and Facilities for Special Needs Group

Question	*No Need*	*Low Need*	*Medium Need*	*High Need*	*Missing*	*Total*
Victims of domestic violence	4	12	57	64	107	244
Data Source: 2014 Housing and Community Development Survey						

People with HIV/AIDS and Their Families

National research has demonstrated that housing is the greatest unmet service need among people living with HIV/AIDS. Part of this can be attributed to several personal and structural factors unique to this population: loss of income due to progressive inability to maintain employment, disease progression requiring accessible facilities, and policy requirements that limit residence in temporary or transitional programs. It is estimated that as many as half of all people living with HIV/AIDS will need housing assistance at some point in their illness.[72]

In addition, homelessness is a barrier to outpatient care and HIV/AIDS specific therapies. The National Coalition for the Homeless reports that between one-third and one-half of all persons with HIV/AIDS are either homeless or at risk for becoming homeless.[73] Research shows that among people with HIV/AIDS, there is a strong correlation between housing and improved access to, ongoing engagement in, and treatment success with health care. When people are housed they, can access and adhere to drug treatments and therapies, which may require fewer hospitalizations and emergency care.[74] This is partially due to the fact that complex medication regimens require that medicines be refrigerated and administered according to a strict schedule. Furthermore, homeless HIV positive individuals have a death rate that is five times greater than that of housed HIV positive people, 5.3 to 8 deaths per 100 people compared to 1 to 2 per 100 people.[75]

Size and Characteristics

According to information gathered from the DPHHS, a total of 548 persons were living with HIV infection in Montana as of 2012[76]. A total of 1,126 cases of HIV have been reported in Montana, of which more than 400 persons are known to have died by 2012. The HIV Epidemiology Profile for Montana in 2012 released additional data regarding characteristics of those diagnosed with HIV. Males have attributed for 86 percent of this population. The largest age group that has received diagnoses were those aged 30 to 39, accounting for 37

[72] http://nationalaidshousing.org/legisadvocacy/hopwa/
[73] http://www.nationalhomeless.org/publications/facts/HIV.pdf
[74] http://nationalaidshousing.org/legisadvocacy/hopwa/
[75] http://www.nationalaidshousing.org/PDF/Housing%20&%20HIV-AIDS%20Policy%20Paper%2005.pdf
[76] http://www.dphhs.mt.gov/publichealth/hivstd/documents/2012HIV-STDupdate.pdf

percent. Non-Hispanic, white persons have the account for the highest portion of the HIV population with 85 percent.

Diagnoses were broken down by county. Missoula and Yellowstone counties had the highest number of new diagnoses, followed by Cascade County, then by Lewis and Clark, Flathead, Gallatin, and Butte- Silver Bow. This is also consistent with the counties with the highest population of persons living with HIV.

Services and Housing Currently Provided

A combination of private non-profit providers and the DPHHS provide HIV/AIDS services in Montana. As part of the effort to combat HIV in the state, the DPHHS orchestrates the HIV Prevention Program. The State of Montana instituted the AIDS Prevention Act in 1997, and revised it in 2009. The Act institutes routine testing. The DPHHS also has a HIV/AIDS Treatment Program. The DPHHS works in collaboration with local city-county health departments, as well as community based organizations to provide the following services for eligible HIV positive individuals:

- AIDS Drug Assistance Program: This program provides anti-retrovirals, protease inhibitors, hydroxyurea and pentamidine to qualified individuals at no cost.
- Health Insurance Continuum of Coverage Program: This program allows eligible individuals to continue their private health insurance by paying all or part (up to $800) of their monthly premiums.
- HIV Case Management: The goal of the case managers is to deliver comprehensive outpatient health and support services to meet the HIV- related needs of individuals and families with HIV. Seven case management sites in the state serve five planning regions.[77]

Table MA-40.J - HIV Service Providers

Service Organization	*Location*
Yellowstone AIDS Project	Billings
Rocky Boy Tribal Health	Box Elder
Bridger Clinic	Bozeman
Browning Tribal Health	Browning
Butte AIDS Support Services	Butte
Dawson County Health Department	Glendive
Hill County Health Department	Havre
Lewis and Clark City-County Health Department	Helena
Flathead City-County Health Department	Kalispell
Central Montana Family Planning	Lewistown
Open AID Alliance	Missoula
Partnership Health Center	Missoula
Data Source: DPHHS	

HIV testing and services are provided by numerous public health clinics throughout the state. Free HIV testing is also provided by many non-profit organizations along with a bevy of other services, such as case management, transitional housing, housing referrals, food pantries, direct financial assistance, support groups and mental health counseling. A partial list of HIV service providers in Montana is provided in Table MA-40.J.

[77] http://www.dphhs.mt.gov/publichealth/hivstd/treatmentprogram.shtml

Services and Housing Needed

Persons living with HIV/AIDS have multiple needs in terms of services. In addition to receiving regular medical attention, case management, and income support, many persons need access to permanent housing solutions. According to the U.S. Department of Housing and Urban Development, 9 out of 10 persons utilizing HOPWA benefits are extremely low to low income. [78] Increased funding for housing for persons living with HIV/AIDS is one of the greatest needs of the HIV/AIDS support programs. For example, there is generally a high need for increased scattered site housing availability, because traditional assisted housing options that involve grouping funding recipients in one site or complex are ineffective in that they can endanger the confidentiality of residents. Additionally, program recipients have a need for longer-term housing options. As the treatment of AIDS has advanced, people are living longer with the disease. Thus longer-term housing options are needed. However, the funding of these long-term housing options can be expensive.

As seen on Table MA-40.K, close to 30 percent of respondents indicated a medium to high need level for services and facilities for persons with HIV/AIDS.

Table MA-40.K - Rated need for services and facilities for special needs groups

Question	*No Need*	*Low Need*	*Medium Need*	*High Need*	*Missing*	*Total*
Persons with HIV/AIDS	10	50	56	18	110	244
Data Source: 2014 Housing and Community Development Survey						

Table MA-40.L shows the HOPWA assistance baselines.

Table MA-40.L - HOPWA Assistance Baseline Table

Type of HOPWA Assistance	*Units Designated or Available with HIV/AIDS and their families*
TBRA	99
PH in facilities	N/A
STRMU	48
ST or TH facilities	N/A
PH placement	147
Data Source: DPHHS	

MA-45 Non-Housing Community Development Assets

Introduction

The Montana Department of Labor & Industry (DLI) produced the *2014 Labor Day Report* [79] documenting the current status of business and job activity in the state. Montana is among the leading states in the nation for a number of economic indicators, including personal income, GDP, job growth, wage growth, business startups, and educational attainment. Montana's unemployment rate is the 11th lowest in the nation and well within normal ranges and the employment growth was the 5th fastest in the nation. DLI's report also notes some concerns about Montana's economy. Montana's rates of entrepreneurialism are high; however, Montana businesses are small and don't hire many employees. The rate of workers separations and hires remains significantly below per- recession levels suggesting labor market frictions are preventing employers from hiring workers for open positions.

[78] https://www.onecpd.info/resources/documents/HOPWA-Fact-Sheet.pdf
[79] http://lmi.mt.gov/media/9329/ldr14.pdf

Additionally DLI's report notes that after 2015, job growth is expected to slow due to worker shortages caused by the retirements of Montana's aging workforce. About 27% of Montana's workforce is 55 or older and approaching retirement age, with these impending retirements potentially reducing Montana's labor force by 137,000 workers. When looking at those entering the labor force, participation rates for both the youngest workers aged 16 to 19 and the college-aged workers aged 20 to 24 have been declining since the mid-80s. Montana will continue to emphasize the need for increasing educational attainment to address the loss of human capital from the retiring workforce and to remain competitive in the global economy.

Economic Development Market Analysis

Table 43 through Table 49 contain data relevant to economic development in Montana.

Business Activity

Table 41 - Business Activity

Business by Sector	*Number of Workers*	*Number of Jobs*	*Share of Workers %*	*Share of Jobs %*	*Jobs less workers %*
Agriculture, Mining, Oil & Gas Extraction	11,464	11,188	5	5	1
Arts, Entertainment, Accommodations	38,755	34,343	17	17	0
Construction	15,959	15,789	7	8	1
Education and Health Care Services	44,818	36,128	19	18	-1
Finance, Insurance, and Real Estate	14,512	11,928	6	6	0
Information	5,273	4,499	2	2	0
Manufacturing	14,163	12,798	6	6	0
Other Services	11,842	10,117	5	5	0
Professional, Scientific, Management Services	15,594	12,731	7	6	-1
Public Administration	0	0	0	0	0
Retail Trade	39,858	33,180	17	17	0
Transportation and Warehousing	7,908	7,297	3	4	1
Wholesale Trade	11,179	8,931	5	4	-1
Total	231,325	198,929	99	99	0
Data Source: 2007-2011 ACS (Workers), 2011 Longitudinal Employer-Households Dynamics (Jobs)					

Labor Force

Table 42 - Labor Force

Criteria	*Status*
Total Population in the Civilian Labor Force	386,231
Civilian Employed Population 16 years and over	360,855
Unemployment Rate	6.57
Unemployment Rate for Ages 16-24	18.23
Unemployment Rate for Ages 25-65	4.15
Data Source: 2007-2011 ACS	

Table 43 – Occupations by Sector

Occupations by Sector	*Number of People*
Management, business and financial	84,216
Farming, fisheries and forestry occupations	12,116
Service	41,639
Sales and office	83,723
Construction, extraction, maintenance and repair	47,983
Production, transportation and material moving	20,482
Data Source: 2007-2011 ACS	

Travel Time

Table 44 - Travel Time

Travel Time	*Number*	*Percentage*
< 30 Minutes	262,576	80%
30-59 Minutes	48,677	15%
60 or More Minutes	15,850	5%
Total	327,103	100%
Data Source: 2007-2011 ACS		

Education

Table 45 - Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	*In Labor Force*		
	Civilian Employed	*Unemployed*	*Not in Labor Force*
Less than high school graduate	14,049	2,087	11,125
High school graduate (includes equivalency)	84,960	6,031	29,662
Some college or Associate's degree	103,282	5,648	28,965
Bachelor's degree or higher	94,732	2,913	17,669
Data Source: 2007-2011 ACS			

Educational Attainment by Age

Table 46 - Educational Attainment by Age

	Age				
	18–24 yrs	*25–34 yrs*	*35–44 yrs*	*45–65 yrs*	*65+ yrs*
Less than 9th grade	1,184	1,117	1,367	4,225	7,431
9th to 12th grade, no diploma	9,861	5,522	3,789	11,241	10,495
High school graduate, GED, or alternative	23,307	24,124	25,931	70,681	42,209
Some college, no degree	26,274	22,441	20,775	58,934	23,213
Associate's degree	2,440	8,270	8,592	19,611	4,665
Bachelor's degree	4,110	19,020	20,537	42,536	14,300
Graduate or professional degree	102	4,628	7,846	20,978	9,301
Data Source: 2007-2011 ACS					

Table 47 – Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	*Median Earnings in the Past 12 Months*
Less than high school graduate	0
High school graduate (includes equivalency)	0
Some college or Associate's degree	0
Bachelor's degree	0
Graduate or professional degree	0
Data Source: 2007-2011 ACS	

Based on the Business Activity table above, what are the major employment sectors within the state?

In order of share, the employment sectors are:

- Education and Health Care Services (1st);
- Arts, Entertainments, and Accommodations (2nd);
- Retail Trade (3rd);
- Construction (4th)
- Manufacturing (5th);
- Professional, Scientific, Management Services (6th); and
- Agriculture, Mining, Oil & Gas Extraction (7th)

Describe the workforce and infrastructure needs of business in the state.

To meet employers' demand for skilled workers, Montana's workforce development system must align with the dynamic needs of local economies. Forming partnerships among educators, workforce development professionals and the private sector will help identify opportunities to connect education and training to the skills necessary in an ever-changing economy. Three key goals of the Governor's Main Street Montana Project (a business plan for Montana) are: 1) to align educational system with the needs of a changing economy; 2) to engage private-public partnerships to provide job training, apprenticeship, and professional development opportunities; and 3) to provide a lifetime continuum of quality education from preschool through adulthood.

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The State of Montana intends to nurture emerging industries and encourage innovation by strengthening the role of universities as technology incubators through research, development, and commercialization; to foster innovation and encourage knowledge-based industries to locate and grow in Montana; and to support entrepreneurs and small businesses to achieve their potential to achieve growth and stability.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

One of Montana's key strengths is our highly educated workforce. Ninety-two percent of Montana's population over 25 years of age has a high school diploma, placing Montana #1 among the 50 states in 2012. Our skilled workforce and quality K-12 education system are recognized as important strength, but we must provide education and training opportunities aligned with the needs of the private sectors. Forming partnerships among educators, workforce development professionals and the private sector will help identify opportunities to connect education and training to the skills necessary in an ever-changing economy.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

Key objectives as identified in the Main Street Montana Projects are to:

- Support efficient, effective and responsive delivery of educational programs designed to meet the needs of businesses and employers;
- Promote community colleges, two-year colleges, and tribal colleges as essential local and regional suppliers of Montana's trained workforce;
- Integrate job skills, workforce preparedness, and entrepreneurial training into the K-12 education system;
- Elevate the role of workforce training programs, apprenticeship and training, and other on-the-job programs as essential suppliers of trained workers for industries that drive Montana's economy;
- Improve opportunities for early childhood education;
- Improve high school student career and college readiness; and
- Provide effective and efficient career paths for Montana higher education students and underemployed job seekers.

Describe any other state efforts to support economic growth.

The State of Montana intends to:

- create a climate that attracts, retains, and grows business by fostering a business-friendly climate through efficient and effective government, increasing access to capital and resources, and coordinating economic development efforts throughout the state.
- Build upon Montana's economic foundation by responsibly developing Montana's natural resources for long-term economic growth, ensuring that Montana businesses and communities have efficient and reliable infrastructure, and protecting Montana's quality of life for this and future generations.
- Market Montana by strengthening and promoting the Montana Brand to recruit businesses and workers and increasing promotion of Montana-made products and exports.
- Nurture emerging industries and encourage innovation by strengthening the role of universities as technology incubators through research, development, and commercialization, fostering innovation and supporting knowledge-based industry efforts to locate and grow in Montana, and supporting entrepreneurs and small businesses to enhance their potential to achieve growth and sustainability.

Institutional Barriers to Affordable Housing

The Land Use Planning Survey reached out to various land use planning officials regarding zoning codes and ordinances that may hinder the development of affordable housing. In total, 24 respondents were reached, another 7 did not respond. The following is a summary of responses to the survey.

Eighteen respondents, or 75 percent, had a definition of a dwelling unit, 50 percent of these that mentioned the word "family" 70.8 percent of respondents had a definition of family, and 35.3 percent of these including the phrase "related by blood, marriage, or adoption." Only one respondent had a definition for disability, others stated they used the ADA definition, but it was not in their own codes. Only 7, or 29.2 percent, respondents had a special appeals process or specific person to see to request a variance for reasonable accommodations or modifications. Two-third of respondents did not have any policies to distinguish senior housing from other multi-family residents. Over half of respondents did not have a definition of a group home and almost 30 percent did not know if they were permitted in single family residential areas.

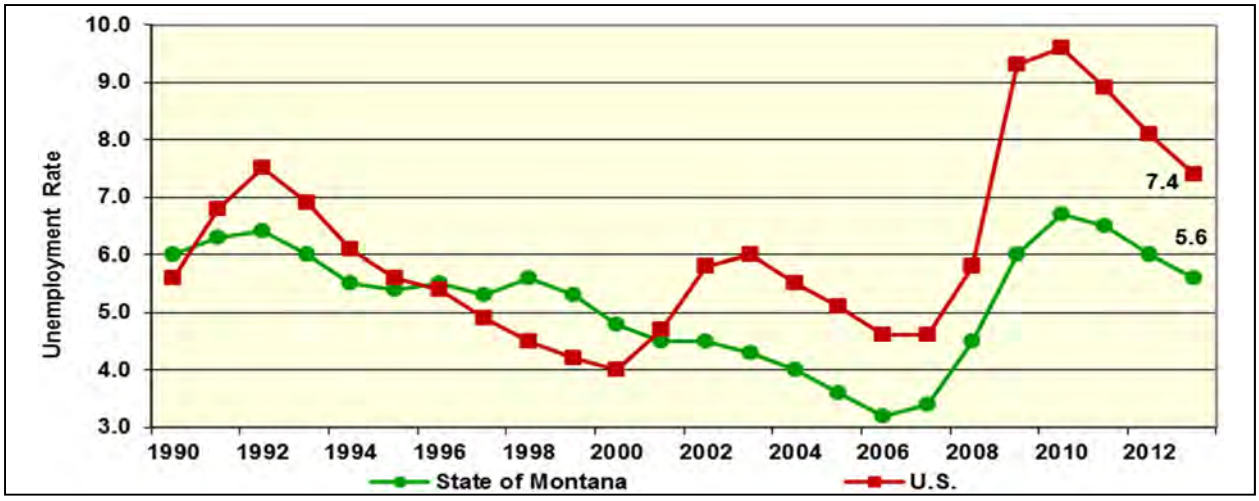
While slightly over 70 percent of respondents indicated that their jurisdictions had guidelines to encourage mixed use housing, only around 20 percent had any guidelines that encouraged affordable housing. Thirteen respondents or 54.2 percent mentioned complications to the development of low to moderate income housing. Some of these complications included the high cost of land, and lack of available land. Other responses included "Not in My Back Yard" type of comment and lack of available funds. 45.8 percent of respondents did not have a fair housing ordinance, and an additional 17 percent did not know. Some respondents mentioned that they followed state

guidelines. 62.5 percent of respondents did not have any specific policies to affirmatively further fair housing. Those that have fair housing policies either worked with Community Action Partnerships of Northwest Montana or NeighborWorks Montana. Some respondents indicated that the Housing Authority handles fair housing guidelines, and one respondent indicated they look to the state for fair housing guidance.

The 2014 Housing and Community Development Survey included questions about barriers and constraints to affordable housing. Responses included comments regarding high cost of land and labor, infrastructure needs and high cost of replacing or improving infrastructure, and land use planning that provides local governments the ability to address natural resource impacts on communities. Additional discussion topics included permitting, private developer incentives, and funding considerations.

Prior to 2007, unemployment in Montana had been on a generally downward trend for nearly two decades thanks to the steady growth in the number of employed persons, which slightly but consistently outpaced the rate at which new members were added to the labor force. However, a large growth in unemployment came after 2007, when the unemployment rate jumped and continues to rise until 2010. Since 2010, the unemployment rate in the state has been falling steadily, reaching 5.6 percent. Looking at this rate compared to the national unemployment rate, Montana has had a lower rate than the national average since 2002, as shown in Figure 8.

Figure 8 - Unemployment Rate



Data Source: 1990–2012 BLS Data

Figure 9 shows the state unemployment rate since 2008. The state saw its highest unemployment rate at the beginning of 2010 and it has been declining since that time, reaching 6.5 percent at the end of 2013.

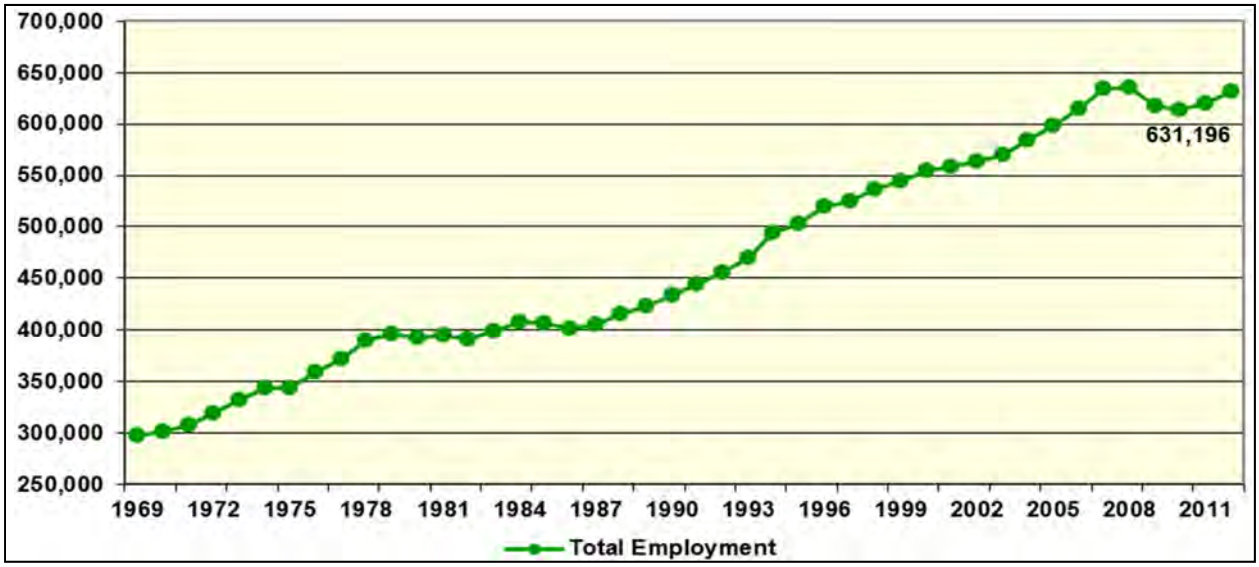
Figure 9 - Montana Unemployment Rate

Data Source: 1990–2012 BLS Data

Full and Part-Time Employment

The Bureau of Economic Analysis (BEA) provides an alternate index of employment; a count of full-time and part-time jobs in the state (Figure 10). These data differ from the BLS data discussed previously in that they are collected where workers are employed rather than at the household level, and the same person may be counted twice in this dataset if he or she works more than one job.

Figure 10 - Full- and Part-Time Employment



Data Source: 1969–2012 BEA Data

The count of jobs in the state and the count of labor force participants both yield a similar portrait; of steady growth in the labor market until 2008. In fact, the BEA data indicate that this growth has been steady since 1969,

and that growth in the number of jobs was uniformly positive for nearly four decades. In 1969, there were around 300,000 jobs in the state. By 2008, that number had grown close to 650,000. However, with the onset of the recession of the late 2000s the number of jobs in the state began to fall, and by 2010 the state had lost over 20,000 jobs. Since 2010, the number of jobs in the state has slowly begun to recover. Though growth in total employment has yet to match pre-recession levels, these recent data 2011 and 2012 are encouraging.

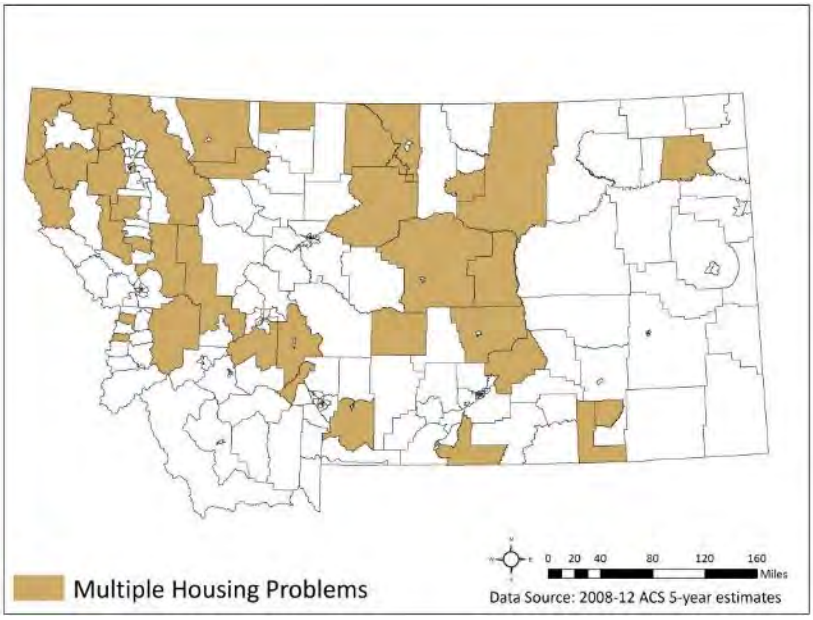
MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The number of housing units with at least one or more housing problems is concentrated in the following Census Tracts indicated in the colored sections of the map below. Concentration is defined as those areas in the 75th percentile on a statewide basis. The percentages of concentration are listed below.

- At least 5.8% substandard (most was 45%)
- At least 24.58% with a severe cost burden (most was 100%)
- At least 7.7% with overcrowding (most was 38%)
- At last 42% with a cost burden (most was 100%)

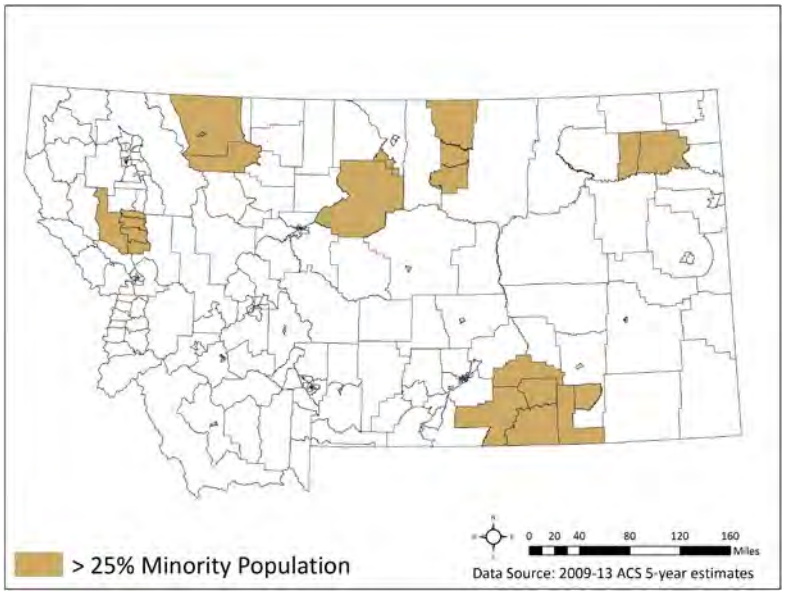
Map 7 – Concentrations of Multiple Housing Problems



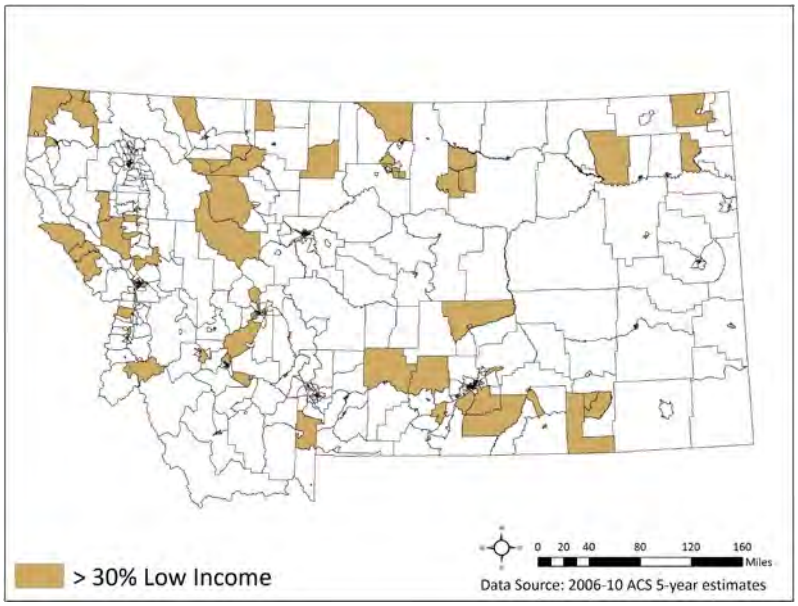
Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

The maps below reflect areas with greater than 25% of the populations declaring a racial category other than “white only” based on ACS data. According to ACS data, “income” is areas with >30% low income. Concentration is defined as a percentage of the population greater than 25%.

Map 8 – Concentrated Minority Census Tracts



Map 9 – Concentrated Low Income Block Groups



What are the characteristics of the market in these areas/neighborhoods?

The local housing markets vary widely across the state and are largely dependent on geographical and social issues specific to any given area. Planning activities such as market analyses undertaken by local organizations and local governments identify local housing needs that are used to ensure a measured, targeted approach is taken when investing federal funds. The state is so geographically large, covering more than 147,000 square miles, and demographically diverse with housing and community development needs that vary widely, that it is not feasible to identify and describe specific market characteristics for the areas that may receive state assistance.

Are there any community assets in these areas/neighborhoods?

Every Montana community has its own unique assets that citizens and local leaders leverage to bolster local housing markets. A variety of organizations supported by Commerce, including CHDOs, HRDCs, CRDCs, work with citizens and local leaders to promote and strengthen local assets, including natural resources and human capital.

Are there other strategic opportunities in any of these areas?

The State of Montana interacts with other agencies, businesses, developers, social service agencies and other organizations to enhance the coordination of efforts to develop housing, support communities, and generate economic development. Commerce supports a broad-based approach to address affordable housing and community development issues through the Consolidated Plan Steering Committee, Housing Coordinating Team (HCT), the Water, Wastewater and Solid Waste Action Coordinating Team (W2ASACT), and the Montana Economic Developers Association (MEDA).

Additionally, the Community Technical Assistance Program (CTAP) housed within the Montana Department of Commerce Community Development Division provides direct technical assistance to local governments and elected officials, land use planners, associated professionals and members of the public on issues related to land use planning and development throughout the state. CTAP helps educate constituents on planning best practices, policy and even regulations that promote affordable housing and support resilient community and economic development. Through hands-on training, workshops, webinars, online resources, direct technical assistance by phone or email, and collaboration with local, state and federal agencies, communities learn how to more effectively utilize policy, code & regulations such as zoning, subdivision, building code and tax increment financing tools to help – not hinder – the development of affordable housing alternatives in their jurisdiction. Additionally, the link between affordable housing and transportation alternatives, proximity to jobs, public services and education is also an important focus of the CTAP program. The Montana Main Street Program (also housed within the Community Development Division at Commerce) further supports these actions by offering additional technical assistance aimed at downtown revitalization through proactive planning and development incentives that support diversity in housing alternatives in Montana's rural communities.

Through these coordinated efforts, private industry, businesses, developers, and social service agencies have both resources and an opportunity to provide input into the Consolidated Plan.

Summary

In 2000, the State of Montana had 412,633 total housing units. Since that time, the total housing stock has increased the number of units, reaching 485,771 units in 2013. According to the American Community Survey in 2012, Montana's housing stock included 346,912 single family units, and 54,345 mobile home units. Of the 482,825 housing units counted in Montana in the 2010 census, 409,607 units were occupied, with 278,607 counted as owner-occupied and 131,189 counted as renter-occupied. This equated to a homeownership rate of 68.0 percent. The *Rental Vacancy Survey* indicated a vacancy rate throughout the state of 3.7 percent. The construction value of single-family dwellings generally increased from 1980 through 2013, reaching over $210,000.

There were 90,575 households below 80 percent MFI with housing need in 2010. By 2020, the number of households with housing needs under 80 percent MFI is expected to reach 96,759 households.

Results from the *2014 Housing and Community Development Needs Survey* regarding housing topics showed needs prioritized as follows: new rental housing construction, rental housing for very low income households, rental

housing rehabilitation, construction of new for sale housing and rental assistance. Comments received from focus group meetings echoed these sentiments, and indicated that there is an increased demand for rentals.

Results from the *2014 Housing and Community Development Needs Survey* regarding human and public service topics showed service needs prioritized as follows: mental health/chemical dependency, senior, transportation, health care, and childcare. Additionally the survey indicated the highest need for a specific subset of a population was persons with severe mental illness, followed by veterans and the frail elderly. 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 living with HIV and their families. While these populations are not homeless, they are considered at risk of becoming homeless and often require housing and service programs to prevent homelessness. Homeless needs throughout the state are handled by the statewide Continuum of Care organization. A count of the homeless population in the state showed that more than 1,878 persons were homeless in Montana in 2013, including 207 homeless families with children and 227 chronically homeless persons.

Section V. Strategic Plan

SP-05 Overview

Strategic Plan Overview

The goals of the Montana Consolidated Plan are to provide decent housing, provide a suitable living environment and expand economic opportunities for its low- and moderate-income residents. Commerce and DPHHS strive to accomplish these goals 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, especially those impacted by the repercussions of COVID-19. By addressing need and creating opportunity at the individual and neighborhood levels, Commerce and DPHHS along with participating communities hope to improve the quality of life for residents. These goals are further explained as follows:

- *Provide decent housing* by helping homeless persons obtain appropriate housing and assisting those at risk of homelessness; supporting urgent need housing activities that address impacts related to repercussions of COVID-19;; helping preserve the affordable housing stock; help sustain and increase availability of permanent housing that is affordable to persons at or below 80% of area median income or less without discrimination; and help sustain and increase the supply of supportive housing.

- *Provide a suitable living environment* by improving the safety and livability of neighborhoods; supporting urgent need suitable living environment activities that address impacts related to repercussions of COVID-19;; improving access to quality facilities and infrastructure; and help reduce the isolation of income groups within an area through de-concentration of low-income housing opportunities.

- *Expand economic opportunities* by helping create jobs accessible to low- and moderate-income persons; supporting urgent need economic opportunity activities that address impacts related to repercussions of COVID-19;; and providing access to financing for development activities.

SP-10 Geographic Priorities

Geographic Area

Housing and community development needs vary widely across Montana. The extreme diversity in available housing, age of housing stock, and overall range in population complicate the assessment of the type and degree of housing and community development needs. Because of the limited availability of resources and the extent of community development and housing needs, Commerce and DPHHS programs are implemented on a statewide basis rather than with geographic priorities.

Entities receiving CDBG and HOME funds must have previous grant awards substantially drawn down before they are eligible to apply for additional program funds. This method has been shown to disburse funds equitably throughout the state, allowing all groups an equal chance to apply for funds and provide an incentive for grant recipients to complete projects on a timely basis. Over time, all funding methods, whether through a formula, competitive, or non-competitive, tend to effectively distribute grant assistance throughout the state.

Because there are no geographic priorities for any of the federal programs, the information generated in IDIS for Table 48 is blank.

Table 48 - Geographic Priority Areas

Not Applicable

General Allocation Priorities

Priorities for funding are based on the *Needs Assessment and Analysis of Impediments to Fair Housing Choice* in this Consolidated Plan; feedback from the Fair Housing and Housing and Community Development surveys, focus groups, and public meetings; and the objectives and outcomes set by the State of Montana to identify projects that help communities improve access to affordable housing and transportation while protecting the environment while measuring the true cost of commuting to residents of affordable housing. The State's housing and community development needs are addressed by receiving, ranking, and funding project applications from eligible local governments, with the additional use of all three CDBG National Objectives to respond to community impacts as a result of COVID-19 repercussions. Communities establish and prioritize local needs through the community planning process, which often results in an eligible project request. Awards are made after requests are ranked and reviewed according to the adopted guidelines and rules for each program. Commerce programs require all applications to be submitted through a local government, to support the growth and development established in planning documents. This application process also develops partnerships and builds capacity between local governments and non-profit organizations, CHDOs or professional service providers.

SP-25 Priority Needs

Table 49- Priority Needs Summary

#	Priority Need	Priority Level	Population – Income Level	Family Types	Homeless Categories	Non-Homeless Special Needs
1	**Affordable Housing Preservation and Construction**	High	All	All	N/A	Elderly/Frail Elderly Disabled – All Addicted Persons HIV/AIDS Domestic Violence Victims
		Description: Encourage the rehabilitation of existing and development of new rental and owner-occupied affordable housing located within walkable neighborhoods and/or served by public transportation systems, particularly for those with special needs and the elderly. This includes the use of CDBG National Objectives of Urgent Need, Slums and Blight and Low and Moderate Income.				
		Basis for Relative Priority: As determined in the Needs Assessment, approximately 105,000 households (26%) in the State of Montana have one or more housing problems. The majority of these renters and homeowners are cost burdened, paying greater than 30% of their household income for housing expenses. Further, according to the Housing + Transportation Index and HUD's Location Affordability Portal, the average household in the State of Montana spends approximately 56% of household income on housing plus transportation costs. Finally, of the 13% of Montanans living with a disability, over 75% of them are 65 years of age or older. Nationally, 32% of persons with a disability in this age category report needing help with or having trouble getting transportation. While Montana is perceived as vast and largely rural, preserving existing housing stock and encouraging higher-density infill housing projects that take advantage of existing buildings, infrastructure and transportation options to recognize the opportunity for mixed-use, flexible-use, and mixed-income projects is an appropriate focus for				

		reducing cost burden. Prioritizing housing options in existing neighborhoods ("location

		efficiency") has the additional benefit of increasing walking and cycling options and the health and well-being of all family types, income levels, and populations with special needs.				
2	**Community Planning**	High	All	All	All	All
		Description: Encourage 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. This includes the use of CDBG National Objectives of Slums and Blight and Low and Moderate Income.				
		Basis for Relative Priority: The first step in revitalizing communities, improving the efficiency of public works investments, and safeguarding rural landscapes and natural resources is planning. Planning for the location and density of future land uses, the needs for public facilities and amenities, the economic and marketing strategy of a community or business, and preliminary design of a potential project results in efficient, affordable, and resilient development and helps communities prioritize local projects. President Obama recently emphasized the importance of planning activities in his Presidential Memorandum dated January 16, 2015, and called on federal agencies to actively support community planning activities with grants and technical assistance through federal programs, including the CDBG program.				
3	**Improving and Sustaining Vital Public Infrastructure**	High	All	All	All	All
		Description: Provide funding opportunities to serve Montanans of low income, particularly special needs and elderly populations, with safe, efficient public infrastructure; improve the safety and efficiency of public infrastructure; promote healthy, safe, and walkable neighborhoods; and safeguard the environment. This includes the use of CDBG National Objectives of Urgent Need, Slums and Blight and Low and Moderate Income.				
		Basis for Relative Priority: In the fall of 2014, the Montana Section of the American Society of Civil Engineers (ASCE) issued a cumulative grade of C- for Montana's aging infrastructure. The report warned that Montana's aging infrastructure is approaching a critical state of disrepair, from neighborhood roads and community schools to safe drinking water, from dams that produce energy and prevent flooding to waterways that irrigate fields, this infrastructure is used by all Montana residents and is essential to our economic future. The State of Montana is committed to investing its federal funds to provide safe, efficient public infrastructure to serve Montanans, particularly those of low to moderate income or with special needs.				
4	**Economic Revitalization**	High	All	N/A	N/A	N/A
		Description: Support and strengthen new and existing businesses, particularly those located within traditional downtown business centers comprising a mix of businesses, housing, and services. This includes the use of CDBG National Objectives of Urgent Need, Slums and Blight and Low and Moderate Income.				
		Basis for Relative Priority: The U.S. Environmental Protection Agency recently released a series of reports documenting the ways in which the geographic concentration of businesses and people increases business productivity and innovation, improves employers' ability to compete for labor, and grows retail sales. More than 10,000 real estate websites now use the Walk Score tool to help market commercial and residential properties, and the AARP recently published an interactive Livability Index to help retirees and senior citizens find "livable" communities with easy access to job opportunities, medical care, retail shops, and entertainment options. Nationally, employers are looking for walkable locations with easy access to public transportation. HUD and the U.S. Census Bureau asked questions relating to walk and bike patterns in the 2013 American Housing Survey, and found that 44% of residents of newly built homes bike or walk, compared to 40% of households overall. A recent survey by the Rockefeller Foundation found that 3 out of every 4 Millennials (Americans 18-34 years of age) reported it is likely they will live in a place where they do not need a car to get around. In order to attract and retain this workforce, Montana needs to create walkable, vibrant communities with convenient access to schools, work, shopping and other amenities.				

5	**Reducing Homelessness**	High	Extremely Low Low	All	All	N/A
		Description: Encourage activities that provide assistance and shelter to homeless Montanans and those at risk of homelessness, particularly homeless veterans, youths and children, and the chronically homeless living in unsheltered locations. This includes the use of CDBG National Objectives of Urgent Need, Slums and Blight and Low and Moderate Income.				
		Basis for Relative Priority: The U.S. Department of Housing and Urban Development (HUD) released the 2014 Annual Homeless Assessment Report (AHAR) documenting the national issues related to homelessness. As documented in the AHAR, Montana had an 84.4% increase in the number of homeless individuals between 2007 through 2014; and has the 5th highest rate (57.8%), among all states, of unsheltered homeless individuals in 2014 (1,167 homeless and 674 unsheltered individuals). Unfortunately the AHAR report stated, "Montana also had very high rates of unsheltered unaccompanied children and youth with 74 percent". Additionally, Montana has the highest rate of unsheltered veterans in the nation (63.3%). Montana's population has a high percentage of veterans, one in ten individuals in the state are veterans. Lastly, between 2007 and 2014, Montana has experienced the largest change in the number of chronically homeless individuals in the nation, at a staggering 208.4% increase in a seven year period. While homelessness has declined nationally, reducing homelessness for veterans, children and youths, and the chronically homeless is a critical priority in Montana.				

SP-30 Influence of Market Conditions

Table 50- Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	As shown by the previous sections, the demand for rentals has increased and is expected to continue to increase throughout the course of this Plan. This state expects to see the need for TBRA to continue as the number of cost-burdened families continues to grow.
TBRA for Non-Homeless Special Needs	The Non-Homeless Special Needs populations have a variety of housing needs throughout the state. The increase in demand for rentals and the increase in the price of rentals will place a high need for special need populations within the state. These increases make rentals unaffordable to many special needs populations.
New Unit Production	As shown by this Market Analysis section, housing production has not been keeping pace with demand, resulting in an increase in price. New unit production will increase the number of affordable units available to Montana households. The 2014 Housing and Community Development Survey results indicated a high level of need for new unit production, especially for rental housing.
Rehabilitation	The State of Montana has seen a slowdown in housing production, and an increase in demand for rental units. This combination calls for a rehabilitation of existing units, both rental and homeowner, in order to meet the needs of households throughout the state. The results of the 2014 Housing and Community Development Survey also indicated a high level of need for unit rehabilitation for both rental units and homeowner units.
Acquisition, Including Preservation	As shown in this Plan, there are a number of subsidized units at risk of expiring. As the demand for affordable rental units continues to increase, the loss of these units will place additional households in need. This, in addition to survey results, have indicated a high level of need for

	preservation of affordable units.

SP-35 Anticipated Resources

Introduction

This section describes the resources expected to be allocated by program type throughout the State of Montana during Plan Year One (April 1, 2015-March 31, 2016). The total amount expected for the remaining four 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 administration allocations are capped at 10% of the new HOME 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 will also continue to receive program income attributable to the Neighborhood Stabilization Program. The State 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 is unknown.

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 the Action Plan, and would 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.

Table 51 - Anticipated Resources

Program	Source of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan	Narrative Description
		Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	Public/Federal	$5,682,163	$100,000	$0	$5,782,163	$22,728,652	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, with preference given to impacts related to COVID-19. This includes the use of CDBG National Objectives of Urgent Need, Slums and Blight and Low and Moderate Income.						
HOME	Public/Federal	$3,002,167	$300,000	$2,700,000	$6,002,167	$13,208,668	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, with preference given to impacts related to COVID-19.						
ESG	Public/Federal	$684,772	$0	$0	$684,772	$2,739,088	State Allocation; ESG funds will be matched with additional resources by subrecipients who receive ESG funds.
	Uses of Funds: Financial Assistance, Overnight Shelter, Rapid re-housing, Rental Assistance Services, Homeless Prevention						
National Housing Trust Fund (NHTF)	Public/Federal	$3,000,000	$0	$0	$3,000,000	$12,000,000	State Allocation
	Uses of Funds: Acquisition, Homebuyer Assistance, Rehabilitation, New Housing Development, or Administration as allowed by federal regulations, with preference given to impacts related to COVID-19.						

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 strive to accomplish the goals of this Consolidated Plan during Plan Year One 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, with preference given to those communities impacted by COVID-19 repercussions. This includes the use of CDBG National Objectives of Urgent Need, Slums and Blight and Low and Moderate Income.

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 to meet the CDBG National Objectives of Low and Moderate Income, Slums and Blight, and Urgent Need.

The State of Montana annually certifies that not less than 70% of the aggregate funds received during a 3-year period (2017, 2018 and 2019) 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. To further expand the use of planning funds beyond the Low and Moderate Income National Objective, the State of Montana will also use Slums and Blight National Objectives for planning activities to reduce, eliminate or prevent slums and blight and address COVID-19 impacts across the state and only under LMI and Slums and Blight. Lastly, the State of Montana certifies that the use of CDBG allocated and program income funds for Urgent Need activities are designed to alleviate an urgency when the following conditions exist:

- Pose a serious and immediate threat to the health or welfare of the community,
- Are of recent origin or recently became urgent and has occurred within the past 18 months,
- The grantee is unable to finance the activity on its own, and
- Other resources of funding are not available to carry out the activity.

The CDBG program requires 25% match funding for projects be secured from local funds. The local share of the project budget 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 on a project by project basis if the local government demonstrates financial hardship and satisfies the CDBG waiver request requirements. 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 be dedicated from non-federal sources. The match for a HOME project is typically obtained through the use of 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%) in partnership with a local government.

ESG funds are frequently matched by sub-recipients who provide 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.

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.

If appropriate, describe publically owned land or property located within the state 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 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 applying for CDBG or HOME grant funds may use publically 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.

ESG grant funds are required to be matched 100 percent 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. Please Reference § 576.201 Matching requirement for further information.

SP-40 Institutional Delivery Structure

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

The Montana Department of Commerce is the lead government entity responsible for Consolidated Plan activities funded through CDBG, HOME and HTF. The Montana Department of Public Health and Human Services is the lead government entity responsible for Consolidated Plan activities funded through ESG.

Table 52 - Institutional Delivery Structure

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
State of Montana	State Government	Administration of CDBG and HOME programs and grant awards	Statewide
Montana cities and towns	Local Government	Administration of CDBG and HOME funded projects serving residents of the jurisdiction	Within municipal boundaries
Montana counties	Local Government	Administration of CDBG and HOME funded projects serving residents of the jurisdiction	Within county boundaries or within municipal boundaries if joint administration of project serving residents of both the municipality and unincorporated areas of a county
Certified Regional Development Corporations	Private, non-profit corporation	Administration of grants to eligible CDBG entities	Within one of 11 regional areas across Montana
Community Housing Development Organizations	Private, non-profit corporation	Recipient and administration of HOME grants	Within area certified as part of grant application
Tribal housing authorities	Public housing authority	Recipient and administration of HOME grants	Within tribal nation boundaries
Human Resource Development Councils	Non-profit community action agency	Recipient and administration of HOME grants and ESG funding	Within one of 12 regional districts across Montana

Assess of Strengths and Gaps in the Institutional Delivery System

Commerce through its employees, community partners, public outreach, and media contacts enhances economic prosperity in Montana; fosters community lead diversification and sustainability of a growing economy; maintains and improves our infrastructure, housing and facilities; and promotes and enhances Montana's positive national and international image. Commerce works to:

- Improve the state's economy through business creation, expansion, retention, and diversification of the economic base.
- Provide technical assistance and training for Montana's entrepreneurs, businesses, and their employees in partnership with local governments and local/regional development groups.
- Enhance the growth of the economy through promotion and marketing of tourism development.
- Promote access to new foreign and domestic markets for Montana goods and services.
- Provide financing for homeownership and rental assistance.
- Improve infrastructure and housing by providing grants and technical assistance.
- Manage the investments of government funds; and

- Provide fair and equal treatment of employees and customers.

The mission of DPHHS is to improve and protect the health, well-being, and self-reliance of all Montanans. DPHHS works to:

- Increase economic security and self-sufficiency of families; and
- Provide essential services and linkages to community resources.

The departments have forged strong relationships with the Montana League of Cities and Towns, the Montana Association of Counties, the Montana Economic Developer's Association, housing organizations, entitlement communities, and private sector businesses across the state to promote economic, community, and affordable housing development statewide. These organizations and agencies have created partnerships with local government entities, social service agencies, benefit providers, faith-based organizations, philanthropic groups, and private industry leaders to deliver housing, job, and community services throughout the state.

Experienced Commerce and DPHHS are staff responsible for the award and administration of federal and state funds to eligible entities. Three Commerce staff members are certified Housing Development Finance Professionals, one staff member is a certified Economic Development Finance Professional, and one staff member is certified with the American Institute of Certified Planners.

Gaps in the institutional delivery system exist primarily due to funding limitations that are outside the control of the State. CDBG, HOME, and ESG resources are not adequate to meet the needs of Montanans of low to moderate income, with special needs, or experiencing homelessness. However, the ability to effectively relay information regarding grant opportunities and technical assistance continues to be one of the State's greatest challenges. Areas of opportunity exist for increased collaboration to ensure that services are delivered. The State seeks to actively engage the public and private sectors in broad discussions and educational opportunities regarding the economic, social, environmental, and health benefits.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Table 53 – Homeless Prevention Services Summary

Service Continuum	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services	X		

Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	
Other			
Other			

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

Homeless persons living with HIV engage in services and referrals through the Ryan White HIV/AIDS Program and Open Aid Alliance, which offers case management and housing assistance through HOPWA. Once housing and healthcare needs have been met, employment services are encouraged.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Community partners working together to provide services, including the Yellowstone AIDS Project and Open Aid Alliance that receive funding from a competitive HOPWA grant, are a strength of the service delivery system. There continue to be significant gaps in the service delivery system for people living with HIV, such as:

- The lack of temporary shelter appropriate for people with compromised immunity. The majority of our clients who are at-risk of homelessness end up in emergency hospital care with serious medical issues. The limited funding for limited hotel stays is not enough time to secure housing.
- The lack of stable housing availability for people with negative financial circumstances.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Affordable Housing Preservation and Construction: The State of Montana will continue to work to preserve existing and construct new affordable housing by increasing collaboration between and within the Departments; and between the State and its local government, federal government, non-profit, and private sector partners.

Commerce reorganized the HOME program into the Community Development Division (CDD) to offer a “one-stop” approach to grant opportunities to rehabilitate existing and construct new affordable housing units. CDD meets regularly with Housing Division staff to coordinate potential affordable housing projects, and to monitor housing data. In addition, the Department remains active in the statewide Housing Coordinating Team and the annual

Housing Conference to maintain and grow relationships with the non-profit and private sector industry to monitor trends in housing needs and help collectively identify and solve barriers to affordable housing. Commerce will continue to provide fair housing information, housing education, and homebuyer counseling in partnership with the HRDCs and CHDOs across the state.

Community Planning: The State has accomplished major strides in increasing funding and technical assistance for communities to engage in comprehensive, strategic, and preliminary design planning for community, housing, economic development, and infrastructure projects. The Community Technical Assistance Program (CTAP), within CDD, continues to provide technical assistance in the areas of land use planning and community development to communities across the state. As part of those services, assistance is provided for comprehensive, strategic, and preliminary infrastructure design planning in the Eastern Montana region impacted by rapid oil and gas development. CTAP has assisted over 24 local counties, cities, and towns adopt comprehensive growth policies, zoning for temporary workforce housing, annexation policies, preliminary engineering reports for increasing capacity in water and wastewater systems, and updated subdivision regulations. This work continues through the 2015-2020 Consolidated Plan period, to assist communities in prioritizing and funding critical community service facilities, housing, public infrastructure, and economic development projects. CTAP continues to provide training and education statewide to local governments, non-profits, and the private sector on topics related to community planning.

Improving and Sustaining Vital Public Infrastructure: The State is keenly aware of the need for improving and sustaining vital public infrastructure, and the importance of safe, efficient infrastructure. During the 2015 Legislative Session, the Governor proposed the "Build Montana Act," with nearly $400 million in state capital, energy conservation, water and wastewater, roads and bridges, renewable resource, mine reclamation, and school facility projects funding through a combination funding. The Legislature eventually passed a reduced proposal with funding for water and wastewater, bridge, renewable resource, and mine reclamation projects. Infrastructure needs still exist statewide, and the State continues to use existing state and federal funding to address the critical projects and proposed increased funding for additional improvements.

Economic Revitalization: The State continues to work to revitalize Montana's economy and local business districts by increasing collaboration within Commerce; and between the State and its local government, federal government, non-profit, and private sector partners.

Commerce recently reorganized the CDBG-ED program into the CDD to offer a "one-stop" approach to grant opportunities for historic downtown and business district revitalization in Montana communities. CDD meets regularly with Business Resources staff, the Montana Economic Developer's Association, and the Certified Regional Development Corporations to coordinate potential job creation, workforce training, Indian Country economic development, and revolving loan fund projects with eligible CDBG grants, and to monitor economic data collectively in order to address needs as they arise. In addition, the Department will remain actively involved in the annual Montana Downtown Conference, Montana Economic Developer's Association Conference, and other state and regional meetings to maintain and grow relationships with the non-profit and private sector industry to monitor trends in economic development and help collectively identify and solve barriers to economic revitalization in Montana communities.

Reducing Homelessness: The State continues to work toward creating community and statewide partnerships, with emphasis on providing "one-stop" referral services. The State and the Montana Continuum of Care Coalition (MTCoC), working with homelessness staff, have adopted a strategic plan for dealing with homelessness, with the intent of reducing or eliminating the length of time any person must experience homelessness.

Goals:

1. Decrease “Most in Need” Family Homeless to 0 by 2016
2. Decrease “Most in Need” Veteran Homeless to 0 by 2019
3. Decrease Individual Chronic Homeless to 0 by 2022
4. Decrease all homeless to 0 by 2023

Targets:

Following targets use 2013 Point-in-Time data as the baseline.

Families:

207 Households containing 665 persons

Intensive need: 80 households containing 273 persons

Shallow Subsidy needs: 127 households containing 273 persons

Individuals:

1097 individual households containing 1304 persons

Intensive Needs: 413 (chronic, duration, frequency and disability)

Shallow Subsidy Needs: 684

Family Strategies:

1. Reallocate CoC funded transitional housing beds (current inventory of 255) to Rapid Re-housing or Permanent Supportive Housing
2. Prioritize current Emergency Solutions Grant for Rapid Re-housing of families
3. Dedicate or prioritize use of Temporary Assistance for Needy Families (TANF) funds for Rapid Re-housing of TANF eligible families
4. Prioritize a limited number of Section 8 Vouchers for Permanent Supportive Housing (PSH) Graduates
5. Increase availability of PSH beds by shortening lengths of stay
6. Create state-funded vouchers

Individual Strategies:

1. Reallocate MTCoC-funded transitional housing beds (current inventory of 255) to Rapid Re-housing or Permanent Supportive Housing
2. Dedicate PSH turnover beds for chronic homeless (200 non-CH beds available)
3. Increase availability of PSH beds by shortening lengths of stay
4. Increase availability of PSH beds by prioritizing Section 8 Vouchers for PSH Graduates
5. Create state-funded vouchers
6. Prioritize current Emergency Solutions Grant for Rapid Re-housing of individuals

SP-45 Goals

Goals Summary Information

Table 54 - Goals Summary

#	Goal Name	Years	Category	Area	Needs Addressed	Funding*	Goal Outcome Indicator
1	**Preserve and Construct Affordable Housing**	2015 to 2019	Affordable Housing	Statewide	Affordable Housing Preservation and Construction	CDBG: $1 million HOME: $2 million NHTF: $3 million	Rental units constructed: 125 Household / Housing Units Rental units rehabilitated: 125 Household / Housing Units Homeowner Housing Added: 25 Household / Housing Units Homeowner Housing: 20 Rehabilitated Household / Housing Units Direct Financial Assistance to Homebuyers: 250 Households Assisted
		Description: The State of Montana will use CDBG, HOME, and NHTF resources to fund affordable housing activities that primarily benefit low to moderate income persons~~.~~, as well as those that are impacted by COVID-19 health and welfare concerns. This includes the use of CDBG National Objectives of Urgent Need, Slums and Blight and Low and Moderate Income.					
2	**Plan for Communities**	2015 to 2019	Non-Housing Community Development	Statewide	Community Planning	CDBG: $500,000	N/A
		Description: The State of Montana will use CDBG funds to help communities engage in various types of planning, including comprehensive community development, housing, public infrastructure, business, downtown revitalization, and preliminary project design. A wide variety of activities are funded that primarily serve LMI persons throughout the state, as well as those that are impacted by COVID-19 health and welfare concerns.~~.~~ This includes the use of CDBG National Objectives of Slums and Blight and Low and Moderate Income.					
3	**Improve and Sustain Public Infrastructure**	2015 to 2019	Non-Housing Community Development	Statewide	Improving and Sustaining Vital Public Infrastructure	CDBG: $2 million	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 5,000 Households Assisted
		Description: 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, as well as those that are impacted by COVID-19 health and welfare concerns.~~.~~ This includes the use of CDBG National Objectives of Urgent Need, Slums and Blight and Low and Moderate Income.					
4	**Revitalize Local Economies**	2015 to 2019	Non-Housing Community Development	Statewide	Economic Revitalization	CDBG: $1.5 million	Jobs created/retained: 100 Jobs Businesses assisted: 20 Businesses Assisted Facade treatment/business building rehabilitation: 5 Businesses

							Brownfield acres remediated: 3 Acres Remediated
		Description: 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, as well as those that are impacted by COVID-19 health and welfare concerns.. This includes the use of CDBG National Objectives of Urgent Need, Slums and Blight and Low and Moderate Income.					

5	**Reduce Homelessness**	2015 to 2019	Homeless	Statewide	Reducing Homelessness	CDBG: $1 million HOME: $1 million ESG: $680,000	Tenant-based rental assistance/Rapid Rehousing: 3,000 Households Assisted Homeless Person Overnight Shelter: 600 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds Added: 23 Beds Homelessness Prevention: 3,000 Persons Assisted Housing for Homeless added: 50 Household/Housing Units
		Description: The State of Montana will use CDBG, HOME, and ESG funds to provide shelter and services for homeless persons and persons at risk of homelessness. Activities may include construction, rehabilitation, and direct assistance to serve this clientele throughout the state~~.~~ , as well as those that are impacted by COVID-19 health and welfare concerns. This includes the use of CDBG National Objectives of Urgent Need, Slums and Blight and Low and Moderate Income.					

* Funding shown in annual estimates

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 91.315(b)(2)

Based on the information above, the number of LMI persons to whom the State of Montana will provide affordable housing will be significant. Approximately 100 LMI persons will be served annually utilizing CDBG, HOME, and potential NHTF resources. Through the ESG Program, approximately 900 LMI persons will be assisted utilizing rapid re-housing and other ESG resources. In addition, approximately 600 LMI persons will utilize emergency, transitional, and overnight shelter funded with CDBG, HOME, and ESG resources.

SP-50 Public Housing Accessibility and Involvement

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not applicable.

Activities to Increase Resident Involvements

Not applicable.

Is the public housing agency designated as troubled under 24 CFR part 902?

No.

Plan to remove the 'troubled' designation

Not applicable.

SP-55 Barriers to Affordable Housing

Barriers to Affordable Housing

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.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The State of Montana has developed several strategies for removing or ameliorating any negative effects of public policies that serve as barriers to affordable housing. The AI has been developed in coordination with this *Draft 2015–2020 Montana Consolidated Plan for Housing and Community Development*. During the implementation of the new AI, several actions were identified to remove barriers to affordable housing, including engaging partners that support and enhance outreach to and education of landlords and property management companies about fair housing rights, supporting efforts to conduct audit tests on rental units, and enhancing outreach and education for American Indian homebuyers through educational forums, credit counseling and home purchase training.

In addition, for each CDBG or HOME project funded, Commerce requires each grantee to ensure that they are Affirmatively Furthering Fair Housing (AFFH) during the project period. An AFFH piece is one element of the Special Conditions of each Contract with the grantees and the activities that each grantee completes during the course of the project, and is monitored during CDBG and HOME project visits.

A comprehensive discussion of barriers to affordable housing, and additional information on specific strategies identified to remove or ameliorate such barriers, can be found within Section AP-75 of this Consolidated Plan. Annually, additional information will be provided in the Action Plan and CAPER regarding actions that have been taken during the previous Program Year and information on proposed actions for the upcoming Program Year.

Additional considerations related to the amelioration of barriers are listed as follows:

Costs of land: According to the Montana Department of Revenue, the market value of residential property statewide fell by a 4.6 percent average in 2014, after making big gains in the three previous, six-year reappraisal cycles. The last cycle's base year was 2008, when Montana was still in the peak of the housing bubble. But housing prices soon crashed in much of the state during the recession, especially in parts of western Montana, and are just starting to recover.

The average market value of residential property fell in 16 western and southern counties, with the biggest drops of 20 percent or greater in such smaller counties as Mineral, Lincoln and Madison. Urban counties also saw drops in residential market value, including Flathead County, where the rate fell 12 percent; Gallatin County, falling 8 percent, and Lewis and Clark County, down 7 percent. Cascade County's average residential market values increased 4.5 percent, while most surrounding counties in northcentral Montana had 14 percent gains. Hill County had a 2 percent gain and Fergus County a 1 percent gain. The biggest gains in residential market value occurred in eastern Montana, with at least 34 percent gains in 17 eastern counties, led by Richland County, in the heart of the Bakken oil boom, which saw average residential market gains of 90 percent and commercial property gains of 212 percent.

Costs of materials: Raw material prices declined sharply in the first quarter of 2015, due in part to China's soft economy, the economic crisis in Greece, the strong U.S. dollar, and a stagnant global demand for oil. The cost of construction materials inched up slightly (0.20 percent) in June, but prices for prepared asphalt, tar roofing and siding; steel mill products; concrete products; crude petroleum; and nonferrous wire and cable all continue to drop.

Costs of labor: According to the U.S. Bureau of Labor Statistics, the construction industry employed roughly 1,822,000 workers nationally. After bottoming out in January 2011 — at more than 600,000 fewer workers than its peak — the industry began slowly rebounding. By March this year, that number had only ticked up to 1.41 million, still 400,000 workers shy of the peak. This shortage of labor has driven up wages for production workers in construction faster than inflation, according to an analysis of statistics from the Bureau of Labor Statistics.

Cost of Building Codes and City Planning Rules and Regulations: Land use regulations are a necessary part of ensuring the health and safety of individuals and communities. Zoning and subdivision regulations are meant to efficiently guide development in communities while building codes are designed to ensure that home construction is safe.

The most important aspect of the relationship between land use regulation and housing affordability is the type and form of regulation. Traditional "exclusionary" zoning can limit the supply and accessibility of affordable housing, thereby raising home prices by excluding lower income households. Exclusionary zoning is typically considered zoning that has the effect of keeping certain population groups, or in some cases, additional population of any kind, out of a community or neighborhood. Techniques such as large-lot zoning, high floor area or minimum residential floor area requirements, which increase housing costs, have been challenged for their potential exclusionary effects. Well-crafted land use policies can break the chain of exclusion by incorporating policies that increase housing densities, encourage a mix of housing types, and promote regional fair share housing or other inclusionary housing elements.

Montana has traditionally employed a minimum of land use regulations at the local level; outside of the incorporated communities, most regulation is limited to subdivision regulations which regulate the division of property to create new lots. Some communities have tried to address neighborhood concerns about higher density developments by establishing design standards and more resident-participatory review processes. As of 2015, the only community in Montana that had adopted an enforceable inclusionary housing ordinance is the City of Bozeman. As local Montana communities recognize the need for more affordable housing, each community has to balance the public interest in limiting increased housing costs while protecting the public health, safety, welfare and quality of life through land use regulations.

Impact Fees: The adoption of impact fees is an alternative available to local governments for generating the revenue necessary to accommodate new development. Impact fees were specifically authorized by the Montana Legislature in 2005 to help local governments pay for improvements, land, and equipment necessary to increase or improve the service capacity of public facilities and services (including water, wastewater, transportation, storm water, flood control, police, emergency medical rescue, fire protection, or other public facilities). Several communities in Montana have adopted impact fees for funding one or more facilities or services, including Bozeman, Polson, Hamilton, Belgrade, Bainville, Kalispell, Missoula, Whitefish, Circle, Miles City and Sidney.

Financing Barriers: According to a recent report by Fitch Ratings, borrowers are seeing "a steady easing" of high credit standards by banks and other lenders. On May 22, 2015, the Federal Housing Authority (FHA) released guidelines to clarify requirements for lenders in an effort to increase mortgage access. The proposed changes require lenders to promise to follow specific requirements in the FHA's guidelines rather than certifying to somewhat broad, vague language. On July 21, 2015, the Consumer Financial Protection Bureau (CFPB) issued an amendment to the Know Before You Owe mortgage disclosure rule that requires easier-to-use mortgage disclosure forms that clearly lay out the terms of a mortgage for a homebuyer and gives homebuyers three days to review financial documents to ensure loan terms and fees have not changed at the last minute. In April 2015, Fair Isaac announced that it would be establishing a new credit score that will allow some 15 million previously unscorable consumers to be scored based on alternative data provided FICO by Equifax, Inc. and LexisNexis Risk Solutions. With the new score, consumers who receive a credit card and handle their payments responsibly for at least six months will receive regular FICO scores.

In response to these changes, according to the Federal Senior Loan Officer Opinion Survey on Bank Lending, May 2015 marked the fourth straight quarter of more U.S. lenders easing loan approval standards as compared to the number of banks tightening up. Combined with historically low interest rates and a slowing rate of price increases for homes, the report noted, easier-to-quality-for mortgages "support a more robust 2015 for the U.S. homebuilding and construction sectors." In addition, Montana residents have access to the Montana Board of Housing loan and mortgage programs with alternatives to conventional loan products.

Sources:
1) Montana Department of Revenue
2) Sharon O'Malley, "ABC: Construction material costs barely rise as 'crisis economics' define market," Construction DIVE, Sharon O'Malley July 16, 2015.
3) U.S. Bureau of Labor Statistics
4) "Creating a Task Force on Regulatory Barriers to Affordable Housing," U.S. Department of Housing and Urban Development, Office of Policy Development and Research (2007).
5) Nelson et al., "The Link Between Growth Management And Housing Affordability: The Academic Evidence," The Brookings Institution Center on Urban and Metropolitan Policy (February 2002).
6) Malpezzi, S. "Housing Prices, Externalities, and Regulation in U.S. Metropolitan Areas" Journal of Housing Research, 7,(2)(1996): pp 209-241; Glaeser, E.L. and J Gyourko, "Zoning's Steep Price," Regulation, 25:3(2002); pp 24-31.
7) Esparza, A. and Carruthers, J., "Land Use Planning and Exurbanization in the Rural Mountain West," Journal of Planning Education and Research, Association of Collegiate Schools of Planning, Vol. 20 (2000).
8) "Fitch Ratings: US Homebuilders Supported via Credit Standards Easing," July 29, 2015

SP-60 Homelessness Strategy

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 and transitional housing needs of homeless persons

Montana encourages efforts to provide shelter and other basic needs to people who are currently homeless. 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 experience 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.

Table SP-60.A indicates the number of days that those surveyed indicated experiencing homelessness. Unfortunately, research indicates that the longer one is homeless, the more difficult and costly it is to stabilize and re-house that person.

Table SP-60.A – Length of Homelessness

Length of Homelessness																
	With Children		Only Child		No Children		Chronically Homeless Individuals		Chronically Homeless Families		Veteran		Un-accompanied Youth		HIV	
1 wk or <	3	1%	0	0%	11	1%	2	1%	0	0%	4	2%	0	0%	0	0%
> 1 wk < 30days	93	16%	2	20%	157	15%	16	6%	0	0%	27	11%	2	20%	0	0%
> 1 mo	144	24%	3	30%	141	14%	16	6%	7	13%	27	11%	3	30%	1	25%
> 3 mos	105	18%	2	20%	144	14%	13	5%	4	8%	28	11%	2	20%	2	50%
> 6 mos	118	20%	2	20%	141	14%	11	4%	6	12%	32	13%	2	20%	0	0%
> 1 yr	92	16%	0	0%	118	12%	64	22%	20	38%	38	15%	0	0%	0	0%
> 2 yrs	36	6%	1	10%	310	30%	163	57%	15	29%	97	38%	1	10%	1	25%
Missing/NA	1	0%	0	0%	10	1%	0	0%	0	0%	3	1%		0%	0	0%
Total	**591**		**10**		**1022**		**285**		**52**		**256**		**10**		**4**	

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and 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 MTCoCs. DPHHS and subgrantees of ESG funding participate in MTCoC strategic planning discussions and attend working meetings. Below is a 10-Year Spreadsheet with tangible targets.

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 those at risk of homelessness and literally homeless based on HUD's definition 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 Human Resource Development Councils (HRDC) submit work plans, budgets, and reports outlining which of the allowable activities will be undertaken.

Table SP-60.B - 10 Year Spreadsheet with Tangible Targets

Families		
	Number of Households	**Number of Persons**
Target Subpopulation:	207	665
Intensive Needs		
Chronic Homeless	14	73
1 or > Disabilities	60	268
Hmlss 3x or 4x	86	273
Hmlss > 3 mos	66	498
Baseline/Target Number:	80	273
Shallow Subsidies		
Hmlss Once	12	46
Hmlsss < 30 days	44	193
No disability	147	571
Baseline/Target Number	127	392

Table SP-60.C 10 Year Spreadsheet with Tangible Targets

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		
2014	20	20	30	30	5	5	5	5	2	2	0	0	62	19
2015	10	30	30	60	10	15	10	15	5	7	20	20	147	46
2016	10	40	15	75	20	35	15	30	5	12	20	40	232	73
2017	10	50	0	75	20	55	10	40	5	17	0	40	277	87
2018	10	60	0	75	0	55	10	50	5	22	0	40	302	94
2019	10	70	0	75	0	55	10	60	5	27	0	40	327	102
2020	15	85	0	75	0	55	10	70	5	32	0	40	357	112
2021	10	95	0	75	0	55	10	80	5	37	0	40	382	119
2022	10	105	0	75	0	55	10	90	5	42	0	40	407	127
2023	10	115	0	75	0	55	10	100	5	47	0	40	432	135
Cumulative Total Beds		115		75		55		100		47		40	432	
Households/ Vouchers		36		23		17		31		15		13		135

** Average family size is 3.2 persons*

SP-65 Lead-Based Paint Hazards

Actions to address LBP hazards and increase access to housing without LBP hazards

The State of Montana is in compliance with the HUD lead-based paint (LBP) requirements established in 2000. As shown in the Needs Assessment, 59% of all owner-occupied units in Montana and 65% of all rental units in Montana are at risk of containing LBP. Projects involving structures built prior to 1980 are considered to have the potential for LBP and consistent procedures have been developed to ensure compliance with federal regulations.

In 2012, the Center for Disease Control recommended that physicians and parents take action steps for children with elevated lead levels greater than or equal to five ug/dL. The DPHHS Health Homes and Lead Poisoning Prevention Program conducted a 2012 field study in 11 counties in Montana, using Medicaid enrollment to identify and test children aged one to five years. Three percent of the nearly 600 Montana children tested had levels greater than or equal to five ug/uL; 25% of all children tested had lead levels higher than one ug/uL.

The State of Montana will continue to diligently undertake rehabilitation and construction activities in order to ensure that households, particularly those with children, benefiting from federal housing programs are safe from LBP hazards. 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, or painting activities are certified and use lead-safe work practices, as required by the U.S. Environmental Protection Agency. If structures are being funded by CDBG or HOME for rehabilitation or homebuyer assistance activities, the units must be tested for LBP and if positive, the LBP must be removed during rehabilitation or prior to securing funds for homebuyer assistance. HOME or CDBG-assisted units constructed before 1980 must be tested for lead-based paint using HUD Performance Characteristics Sheet Testing and applicable industry standards. CDBG or HOME-assisted units must be free of lead-based paint prior to

occupancy. In addition, Uniform Physical Condition Standards (UPCS) inspections are performed annually at HOME, Section 8, and other public rental properties throughout the state. UPCS inspections are conducted on all homes purchased with HOME assistance prior to the commitment of HOME funds. For many projects, CDBG and HOME program funds can to be used to assist with the cost of LBP testing and remediation activities.

While HOME program and Housing Division staff conducting visual inspections already complete HUD's on-line Lead-Based Paint Visual Assessment Training, the Community Development Division will add this 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.

How are the actions listed above integrated into housing policies and procedures?

In the adopted CDBG Housing and HOME grant application guidelines, applicants are required to document that proposed rehabilitation activities have been assessed for LBP or lead water service lines; that the applicant has the resources to ensure that certified LBP inspectors and contractors are available to accomplish the proposed activities; and that the cost and design of the proposed activity takes LBP removal and remediation into account. Applicants for CDBG and HOME funding are required to certify that they accept all program requirements, including compliance with all state and federal LBP requirements and regulations.

Commerce requires that Preliminary Architectural Reports (PARs) funded with state or federal funding through the Department, or submitted in support of a grant application for any state or federal funding, meet the requirements of the Department's PAR requirements, which have been adopted as part of the requirements for both CDBG and HOME grant applications. These requirements, among other things, require every PAR to describe all concerns, deficiencies, compliance issues, and relevant regulations related to LBP, evaluate the existence of LBP in any existing facilities, and describe all mitigation measures that will be implemented to remediate any LBP.

Commerce's *2015 Tenant-Based Section 8 Program Administrative Plan* requires all Housing Choice Voucher and Shelter Plus Care rental units to meet Housing Quality Standards (HQS), including LBP assessment, disclosure, testing, remediation, and on-going unit maintenance as applicable.

SP-70 Anti-Poverty Strategy

Jurisdiction Goals, Programs and Policies for reducing 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 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 this Consolidated 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 centers encourage healthy, vital, and resilient communities.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The priority needs, program goals, policies, procedures, and guidelines for the CDBG, HOME, and ESG programs, as well as other state programs that fund affordable housing, job creation, and community services, are all in alignment in addressing the impacts of poverty and increasing the quality of life and economic prosperity of Montanans of lower income levels.

Montana is committed to utilizing employment as the primary strategy for poverty reduction. The state has a well-coordinated employment and training system, which ensures that resources for advancement through employment, such as the Workforce Investment Act (WIA), TANF, and other state resources such as higher education, are available to low-income families. The Work Readiness Component (WoRC) provides employment and training services to individuals receiving cash assistance. Administrators of these programs meet regularly to ensure coordination and results.

The state provides a series of work support programs to stabilize families as they increase their skills and seek better employment. These supports include TANF, energy assistance, health care, childcare, housing assistance and advocacy. SNAP (Supplemental Nutrition Assistance Program, formerly the Food Stamp Program) provides benefits to eligible families to supplement their food budget and increase their ability to purchase healthy foods. SNAP Nutrition Education, operated jointly with Montana State University, teaches participants to use their food stamp benefits wisely. The Healthy Montana Kids program provides health coverage to children of households of lower incomes, and the Montana Legislature recently voted to expand Medicaid coverage under the Affordable Care Act.

In November 2006, Montana voters approved Initiative 151, which raised the minimum wage from the federally mandated $5.15 per hour to $6.15 per hour on January 1, 2007. The initiative also calls for annual adjustments tied to the cost of living. The wage, which is adjusted each year based on the national Consumer Price Index, increased to $8.05 per hour on January 1, 2015.

SP-80 Monitoring

Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The goals of the Consolidated Plan will be monitored on a yearly basis as required as part of the CAPER submitted to HUD. Monitoring consists of:

- HOME-funded projects are monitored annually to determine compliance with housing codes and applicable HUD regulations and Commerce policies. Project monitoring is based on a guide found in the HOME Grant Administration Manual. Key issues include assessment of affirmative marketing actions, outreach to minority and women owned businesses, data on the amount and use of program income, number of projects, and eligibility of tenants and homebuyers, rent levels, purchase prices, and compliance with subsidy limits. Following the monitoring visit, staff provides a written letter to the

grantee indicating any issues or findings identified. The grantee must to respond to any issues or findings. During plan year 2014, no unresolved findings were issued.

- Homebuyer and rental grantees provide annual certifications to the HOME program. Certifications require homebuyer grantees to verify either that homes are continuing to be used as the principal residences of participants, or if transfer of the property has occurred, that program income has been recaptured and accounted for. All rental projects must certify that inspections for housing quality standards are complete and that affordability requirements regarding income and rent limits have been met.
- HOME-funded rental projects receive on-site visits every year for projects with 26 or more units, every 2 years for projects with 5 to 25 units, and every 3 years for projects with 1 to 4 units. These on-site visits allow staff to verify that tenant income certifications, rental agreements, rent limits, and inspection results meet HUD and Commerce requirements. Staff also reviews the facility's condition to ensure that it remains safe, decent, and sanitary.
- CDBG-funded projects receive periodic on-site monitoring visits during the plan year. Program staff monitor the critical elements of each project at least once. Staff completes an extensive checklist, reviewing each project element for compliance with all applicable federal, and state program requirements. Following the monitoring visit, staff issues a formal letter to the chief elected official of the local government reporting on the monitoring visit, noting any findings as may be applicable, and asking the local government to respond promptly.
- CDBG staff monitors all projects through regular contacts with the local project manager and written quarterly and drawdown progress reports. These reports provide information and updates concerning project activities and progress on objectives from start-up through closeout of the project.
- DPHHS provides on-site monitoring of the ESG Program via regularly scheduled monitoring visits by program staff, using a monitoring tool. 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.

Appendix A: Citizen Participation Plan

Montana Citizen Participation Plan
– Amended
2015 – 2019 Consolidated Plan and
Annual Action Plan

Introduction

In 1994, the U.S. Department of Housing and Urban Development (HUD) issued new rules consolidating the planning, application, reporting, and citizen participation processes of three formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships (HOME), Housing Trust Fund (HTF), and Emergency Shelter Grants (ESG). The new single planning process was intended to more comprehensively fulfill three basic goals: to provide decent housing, to provide a suitable living environment, and to expand economic opportunities.

Provision of decent housing may involve assisting homeless persons to in obtaining appropriate housing and assisting persons at risk of becoming homeless;, retaining and improving the affordable housing stock;, increasing the availability of permanent or transitional affordable housing for low- and moderate-income households, particularly to members of disadvantaged minorities, without discrimination on the basis of race, color, religion, sex, national origina, familial status, or disability; or increasing the supply of supportive housing, which combines structural features and services needed to enable persons with special needs, including persons with HIV/AIDS and their families, to live with dignity and independence; and providing housing affordable to low- and moderate-income persons accessible to job opportunities. to assist persons with special needs.

Providing a suitable living environment might entail improving the safety and livability of neighborhoods;, including the provision of adequate public or community facilities; increasing access to quality public and community facilities and services; reducing the isolation of income groups within a community or geographical area through the spatial de-concentrating of housing opportunities for persons of lower income and the revitalizationing of deteriorating or deteriorated neighborhoods; restoring and preserving natural and physical features with historic, architectural, and aesthetic value; and conserving energy resources by promoting planning and thoughtful design.

Expanding economic opportunities can involve creatieng of and retaining accessible jobs, providing access to resources for community development, assisting low-income persons in achieving self-sufficiency, and fostering a competitive workforce. This can include establishing, stabilizing, and expanding small businesses (including microbusinesses); providing public services concerned with employment; providing jobs involved in carrying out activities under programs covered by the Consolidated Plan to low- and moderate-income persons living in areas affected by those programs and activities; ensuring the availability of mortgage financing for low- and moderate-income persons at reasonable rates using non-discriminatory lending practices; increasing access to capital and credit for development activities that promote the long-term economic and social viability of the community; and creating empowerment and self-sufficiency opportunities for low-income persons to reduce generational poverty in federally assisted and public housing.

The Consolidated Plan for Housing and Community Development is actually a three-part planning process required by HUD. The Consolidated Plan is comprised of a 5five-year strategic plan, annual action plans (including annual

allocation plans for the HTF program), and annual performance reports; these documents construct the framework whereby Montana can identify its housing, planning, infrastructure, economic, and homeless~~, community, and economic development~~ needs. The~~is~~ process helps identify resources that will be employed and actions to be taken that will address the needs, as well as aids in the review and evaluatione~~e~~ of the State's progress toward achieving its strategic goals. Completing these documents on time and in a manner that is acceptable to HUD ensures program funding.

The Consolidated Plan process begins with the Citizen Participation Plan (CPP). The objectives of the CPP are to ensure that the citizens of Montana, particularly persons of low and moderate income, persons living in slum and blight areas, persons or units of local government experiencing impacts related to urgent needs, housing agencies, and other interested parties, are provided the opportunity to participate in the planning and preparation of the Consolidated Plan, including amendments to the Consolidated ~~Plan and the~~ Annual Performance and Evaluation Report (CAPER). In doing so, the CPP sets forth general policies and procedures for implementing and carrying out the Consolidated Planning ~~P~~process, such as how the Consolidated Plan will be developed, dates and milestones along which the process will proceed, and methods for citizens to offer the State assistance and guidance in the formulation of the ~~P~~plan. Furthermore, the provisions of the CPP fulfill statutory and regulatory requirements for citizen participation specified in HUD's~~the U.S. Department of Housing and Urban Development's~~ rules for the Consolidated Plan, the HOME, CDBG, HTF, and ESG programs. In Montana, the participation process will be developed and monitored by a Consolidated Plan Coordinating Committee consisting of representatives from the Montana Department of Commerce (Commerce) and the Montana Department of Public Health and Human Services (DPHHS).

Purpose of the Citizen Participation Plan

This CPP sets forth the State of Montana's policies and procedures for citizen participation during the Consolidated Planning process. In order to ensure maximum participation in the Consolidated Plan process among all populations and needs groups, and in order to ensure that their issues and concerns are adequately addressed, the State of Montana will follow~~ed~~ the standards ~~set forth in this Citizen Participation Plan~~herein during development of its Consolidated Plan documents including: the 5-Year Consolidated Plan, Annual Action Plans (AAPs) ~~,~~and H~~ousing~~ T~~rust~~ F~~und~~ Allocation Plans prepared during the 5-~~five~~ year period, and Consolidated Annual Performance~~,~~ and Evaluation Reports (CAPERs) documenting the State's performance during each year of the 5-~~five~~ year period. ~~of the Consolidated Plan, and the Citizen Participation Plan.~~

The C~~itizen~~ P~~articipation~~ P~~lan~~ ~~also~~ provides citizens an opportunity to evaluate and comment on the State's Consolidated Plan documents, including this C~~itizen~~ P~~articipation~~ P~~lan~~. Alternative formats of the Consolidated Plan documents are available upon request. ~~The Department of~~ Commerce will make reasonable accommodations for persons with disabilities or who have a Limited English Proficiency and who wish to participate in this process or need an alternative accessible format of the notices, documents, or presentation materials. Presentation materials will be provided in advance of the hearings and posted on ~~the~~ Commerce's website: https://commerce.mt.gov/conplan.

The CPP also provides reasonable notice and comment periods in urgent need situations such as COVID-19. Standards for reasonable notice and comment periods are outlined throughout this CPP.

Citizens ~~were~~ are invited to provide comments on all documents required under the Consolidated Plan. Comments can be submitted electronically at DOCCDD~~P~~@mt.gov or DOCConPlan@mt.gov or by mail to the Community Development Division at 301 S. Park Avenue, P.O. Box 200523, Helena, Montana 59620-0523. Additional information can be found on ~~the in the Montana Department of~~ Commerce's website: https://commerce.mt.gov/conplan~~http://comdev.mt.gov~~

Relevant Areas

The term "entitlement areas" refers to cities and counties that qualify to receive one or more HUD formula grants. These areas must complete a Consolidated Plan separately from the State's to receive funding and include Billings, Great Falls, and Missoula. For purposes of this C~~itizen~~ P~~articipation~~ P~~lan~~, "non-entitlement" refers to cities and towns that do not file Consolidated Plans individually or as part of a consortium and are not eligible to receive formula funding from HUD directly. Individuals wishing to contribute to the Consolidated Planning process in ~~these~~ entitlement areas should contact housing and community development specialists in these cities. This CPP is concerned only with activities associated with the State's HUD allocation and those areas of Montana where such activities may occur.

Encouraging Citizen Involvement

Public Notice and Outreach

An informed citizenry is critical to effective and responsive housing and community development programs. Efforts to educate residents and empower participation are an ongoing element of the Consolidated Planning process.

To notify ~~The CPP is the fundamental means of notifying~~ interested citizens about the Consolidated Plan and related activities, such as the A~~nnual~~ A~~ction~~ P~~lan~~, H~~ousing~~ T~~rust~~ F~~und~~ Allocation Plan, or the C~~onsolidated~~ A~~nnual~~ P~~erformance and~~ E~~valuation~~ R~~eport~~, the State will publicly announce the public comment period. ~~–~~The State will utilize~~d~~ display advertisement notices in newspapers of general circulation and ~~through~~ Commerce's and/or ~~M~~DPHHS's websites and list~~-~~serv~~e~~s. ~~All n~~Notices are published at least 15~~0~~ days prior to public hearings~~ occurring before publication of documents for comments~~. When activities are in response to an urgent need like COVID-19, the State will waive the 15-day notice requirement and provide what it deems to be reasonable notice and may not use display advertisements, but will use electronic media. All notices will be~~are~~ written in plain, simple language and direct efforts will be~~are~~ taken to publish and/or post information at locations that will~~ould~~ elicit maximum low- and moderate-income and minority participation.

Public education and outreach will be~~are~~ facilitated through the use of public advertisements that describe the Consolidated Planning process, opportunities for citizen participation, and available funding through the CDBG, ESG, HTF, and HOME programs. When education and outreach are necessary due to an urgent need such as COVID-19, the State may choose to publish virtual advertisements and promote via social media and may forgo display advertisements in newspapers. All outreach will be written in plain, simple language, and direct efforts will be taken to publish and/or post information at locations that will elicit maximum low- and moderate-income and minority participation.

The State's Consolidated Plan mailing list includes social service organizations, local jurisdictions, low-income housing consumers, neighborhood groups, previous participants and commentators, businesses, developers, and other interested parties.

The Consolidated Plan offers many ~~other~~ opportunities for citizen participation. The State may use surveys, general feedback or listening meetings for specific programs, and other means to solicit input in the development of the ~~c~~Consolidated P~~p~~lan documents. The State will particularly encourage~~s~~ participation of persons with special needs and/or persons who are often underrepresented in the public process (low-income, persons of color, non-English speaking persons, persons with disabilities, persons who are homeless). The State will provide Consolidated Plan documents in alternative formats

upon request. The State will also encourages the participation of statewide and regional institutions and organizations that are involved in or affected by the formula grants throughout the development and implementation ofin the process of developing and implementing the Consolidated Plan. Participation will beis solicited and encouraged through the activities detailed below.and Consolidated Plan documents can be provided in alternative formats upon request. .

Public Hearings and Input Meetings

Public hearings and input meetings allow the State to engage citizens in the Consolidated Plan process. All public hearings will be held at a time and accessible location convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. To meet the needs of non-English speaking residents, alternative formats of Consolidated Plan documents will be provided upon request. Any person needing a reasonable accommodation will need to contact Commerce, prior to the public hearing or the end of the public comment period.

At least oneTwo public input hearing meetings arewill be held before the publication of the draftfinal Consolidated Plan. The primary purpose of thise first public hearing is to gather citizen input on housing and community development needs and proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH, as well as to use citizen input to inform the development of the Consolidated Plan. A 30-day public comment period, with at least 15 days notice of the public hearing will be provided. Citizen input from this hearing will be used to inform the development of the the proposed Consolidated Plan before it is published for comment. Additionally, during the development of the Consolidated Plan, the State will explore alternative public involvement techniques that encouraged a shared vision of change for communities and the review of program performance through focus groups, use of the internet, and virtual meetings.

After the publication of the draft Consolidated Plan, aThe second public hearing will beis held during the Consolidated Plan 30-day public comment period for review and comment from the all interested partieson the Consolidated Plan draft. Again, as noted above, allThe public hearings will beare announced at least 150 days prior to o c c u r r e n c e being held. Announcements are made through Commerce or MDPHHS websites, listserves, and at least one newspaper of statewide circulation.

The public hearings take place in locations or through virtual means identified in the announcement of the public hearings that are accessible to persons with disabilities. The dates, times and locations for public hearings are convenient to potential and actual beneficiaries. Non-English speaking persons and those with disabilities are encouraged to attend. Where a significant number of non-English speaking residents are expected to participate, the State provides translators, when notified of this need, prior to the public meetings. Contact information is provided in all public announcements.

Regional, Interest Area Hearings, Focus Groups, and Other Meetings

In addition to the public hearings, Commerce and the MDPHHS may solicits input on housing and community development issues and needs of the homeless population at regional or interest area forums or focus groups. If these types of meetings are conducted, Aagencies, advocates, statewide and regional institutions and organizations, and community residents will beare informed of the meetings through state agency websites, personal contact, media releases, and other methods that the State believes may beas productive. All sites selected for the forums or focus groups are accessible to disabled persons. The State will works with advocacy groups to accommodate special needs groups and non-English speaking attendees.

~~The f~~Forums will be~~are~~ conducted with the intention of providing Montanans~~ residents~~ the opportunity to voice their opinions and provide insight into the issues prevalent in their communities. The forums will also provide an opportunity for citizens and interested parties to obtain information about state housing and community development programs, ~~the~~ administering agencies, and funding requirements.

Publication of Consolidated Plan Documents

The State will publish~~es~~ its draft Consolidated Plan documents for public review in a manner that affords citizens, public agencies and other interested parties a reasonable opportunity to examine ~~its~~ contents and submit comments.

Except under extenuating circumstances such as COVID-19, ~~T~~the draft Consolidated Plan documents will be~~are~~ available at selected repositories for the full public comment period. A list of the repositories appears at the end of this C~~itizen~~ P~~articipation~~ P~~lan~~. ~~-~~The draft Consolidated Plan documents will also be~~are~~ available for viewing on ~~the Montana Department of~~ Commerce's website~~, located~~ at http://comdev.mt.gov. ~~-~~Although interested parties will be~~are~~ encouraged to use the repositories' copies or view documents~~the Consolidated Plan~~ on the Internet, a reasonable number of hard copy~~ies of the proposed~~ Consolidated Plan documents will be~~are made~~ available upon request~~from Commerce during the public comment period~~.

Citizens or groups that have attended any ~~of the~~Consolidated Plan forums or public hearings will be~~are~~ notified by mail or e-mail (listserv) of ~~the Consolidated Plan's~~document availability for comment.

The Consolidated Plan documents will describe the amount of assistance the State expects to receive, or has received, and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income and the plans to minimize displacement of persons and to assist any persons displaced.

The State will openly consider~~ed~~ any comments made by~~of~~ individuals or groups received verbally or in writing, including e-mail, during the Consolidated Plan process or at public hearings. ~~-~~A summary of the written and public hearing comments will be~~are~~ included in ~~the~~ final Consolidated Plan documents, along with the State's response to each~~the~~ comment~~s~~.

Public Comment on the Consolidated Plan Documents

Prior to the adoption of the 5-year ~~S~~strategic Consolidated Plan, A~~nnual~~ A~~ction~~ P~~lan~~s, HTF Allocation Plans, and any amendments, the State will make~~s~~ available to interested parties the draft documents for a comment period of no less than 30 days. When Consolidated Plan activities are in response to an urgent need like COVID-19, the State may waive the 30-day comment period requirement and provide the public a minimum 5-day comment period. Notification of the availability of the ~~proposed~~ Consolidated Plan, AAP, and HTF Allocation Plan documents will occur as outlined above~~appeared in at least one newspaper that is circulated throughout the state~~.

Before ~~the State~~ submit~~tings~~ a ~~Consolidated Annual Performance and Evaluation Reports (~~CAPER~~)~~ to HUD, the State will make~~s~~ available to interested parties the proposed CAPER for a comment period of no less than 15 days. When Consolidated Plan activities are in response to an urgent need like COVID-19, the State may waive the 15-day comment period requirement and provide the public a minimum 5-day comment period. Notification of the availability of the CAPER will occur as outlined above. ~~Citizens are notified of the CAPER's availability through newspaper and email notification informing citizens of the~~

~~day the CAPER is available to view on the Department of Commerce Community Development Division's website and the specific time period available for comments and the contact information to submit comments.~~

All Consolidated Plan documents will be~~are~~ available on Commerce's website for the full, prescribed public comment period. Hard copies of the documents will be~~are~~ available upon request ~~from Commerce during the applicable public comment period~~. The State will consider~~s~~ any comments of individuals or groups received verbally or in writing, including e-mails, or at public hearings. A summary of the written and public hearing comments and the State's responses will be~~are~~ included in the applicable final Consolidated Plan documents.

Public Access to Records

The State will provide~~s~~ all interested parties with access to information and records related to the State's Consolidated Plans, AAPs, and CAPERs, as well as~~and~~ the State's use of assistance under all programs covered by the Consolidated Plan during the preceding ~~five~~5 years. The public is provided with reasonable access to housing assistance records, subject to laws regarding privacy and obligations of confidentiality.

Consultation with Organizations and State Agencies

When preparing the Consolidated Plan documents, the State will actively consult~~s~~ with public and private agencies that provide housing, health and social services in order to ensure that the interests and needs of all groups are adequately addressed. This consultation may occur~~s~~ through regional and interest area forums, interviews conducted with such organizations (especially those that provide services to special needs populations), and incorporation of data and reports produced by such organizations into the Consolidated Plan documents.

Amendments to the Consolidated Plan

There are two types of amendments to the Consolidated Plan: administrative or minor amendments and substantial amendments. Pursuant to HUD regulations, a substantial amendment to the Consolidated Plan occurs whenever the jurisdiction determines one or more of the following criteria have been met:

- Amendment ~~S~~substantially (15% or more~~less~~) changes the allocation priorities or its method of distributing HUD formula grant funds;
- Amendment ~~U~~utilizes formula grant funds (including program income) to carry out an activity not previously described in the action plan; or
- Amendment ~~C~~changes the purpose, scope, location or beneficiaries of an activity.

Such changes, prior to their implementation, are reviewed under various federal or local requirements, particularly rules on procurement and/or policies on the allocation of public resources. Substantial amendments to ~~the~~ Consolidated Plan documents are subject to a formal citizen participation process. Notice and the opportunity to comment is provided to citizens through public notices in local newspapers and other appropriate means. A public comment period of not less than 30 days will be~~is~~ provided prior to implementing any substantial amendment to a~~the~~ Consolidated Plan document. When an amendment is in response to an urgent need like COVID-19, the State may waive the 30-day comment period requirement and provide the public a minimum 5-day comment period.

State staff will prepare~~s~~ a summary of all comments received in writing and, in cases where any citizens' views are not accepted, provide reasons for the decision. This documentation will be~~is~~ attached to the

~~S~~substantial ~~A~~amendment, which will be~~is made~~ available to the public and submitted to HUD. After the program year has elapsed by 6 months, the Commerce Director, at his/her discretion, may reallocate up to 15% of the annual HUD CDBG, HOME, or HTF award that has not been expended or awarded to state grantees, in between normal grant application cycles, to expedite necessary projects and meet the expenditure of funds consistent with HUD regulation and the objectives of the programs.

Occasionally, public comments or events warrant an amendment to ~~the~~ Consolidated Plan documents. Montana uses Substantial Amendment Criteria to determine the need to amend ~~the~~ Consolidated Plan documents. The State's Substantial Amendment Criteria include~~s~~ a change in the described method of distributing funds to local governments or nonprofit organization subrecipients to carry out activities. The ~~A~~application process for subrecipients and criteria for selecting subrecipients are elements of the "method of distribution."

"Administrative~~Standard~~ amendments" are those that are not considered substantial in nature and chiefly pertain to minor, administrative modifications of the programs. Thus, they do not require in- depth citizen participation.

Citizen Participation in the Event of a Substantial Amendment

In the event of a substantial amendment of Consolidated Plan documents, the State will comply with the following citizen participation process:

1. The State will notify citizens of the availability of the draft substantial amendments, a minimum 30-day comment period (unless waived, then a minimum 5-day comment period), and, if in the State's judgment a public hearing is warranted, the time and location of the public hearing through ~~a~~ newspapers of general~~statewide~~ circulation.
2. Depending on which of the formula grant programs is affected, the substantially amended sections of the Consolidated Plan document will be made available on ~~the~~ Commerce's website, https://commerce.mt.gov/conplan/documents~~http://comdev.mt.gov~~. ~~-~~Hard copies will also be available upon request~~from Commerce and MDPHHS for the full duration of the public comment period~~.

Consideration of Public Comments on the Substantially Amended Plan

In the event of substantial amendments to~~of~~ Consolidated Plan documents, the State will openly consider any comments ~~on the substantially amended Consolidated Plan~~ from individuals or groups. Comments must be received in writing, including e-mail, or verbally at public hearings if hearings are conducted. A summary of the comments received on the substantial amendments will be included in the final, substantially amended Consolidated Plan documents. A summary of all comments not accepted and reasons for their dismissal will be included in the final, substantially amended Consolidated Plan documents.

Changes in Federal Funding Level

Change to federal funding levels that affect the distribution of funds identified in the Consolidated Plan documents will not be considered either an administrative amendment or a substantial amendment.

Complaints and Grievances

Citizens, administering agencies, local governments, and other interested parties may submit complaints regarding violations of this C~~itizen~~ P~~articipation~~ P~~lan~~ or federal regulations regarding the preparation of the Consolidated Plan documents or amendments to the documents.

Citizens may also present complaints and grievances orally or in writing at the community meetings, and/or public hearings. All public comments, including complaints and grievances, made either orally or in writing within the 30-day public comment period (or 5-day public comment if the 30-day public comment period requirement is waived), will be~~are~~ included in the final Consolidated Plan documents. Such complaints or grievances should be directed to the Consolidated Plan representative, Jennifer Olson, ~~Community Grants Bureau Chief~~Division Administrator, Community Development Division (or successor) at 301 S Park Ave, Helena MT 59602; 406-841-2770; or DOCConPlan@mt.gov or DOCCDD@mt.gov.

Timely Response to Complaints or Grievances

Within 15 calendar days of receiving the complaint, the entity or individual receiving the complaint should forward the complaint to the Consolidated Plan representative listed above to respond to the complainant in writing. A copy of the State's response from the Consolidated Plan representative will be transmitted, concurrently, to the complainant and to the Commerce Director or ~~M~~DPHHS Director, as programmatically applicable. If, due to unusual circumstances, the Consolidated Plan representative finds that it is unable to meet the prescribed time limit, the limit may be extended by providing written notice to the complainant. Such notice will include the reason for the extension and the date by which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

Public review materials and performance reports will include data, as appropriate under confidentiality policy and regulations, on any written complaints received and how each was resolved.

Citizen Participation Requirements for Local Governments Receiving CDBG (Small Cities Development Program) Funds from the State

Units of general local government must provide for and encourage citizen participation as prescribed at 24 CFR 570.486. All Small Cities Program applicants for CDBG funds are required to provide citizen notification and involvement in planning and implementation of the proposed projects through one or more public hearings and other informational efforts. Public hearings must be held at times and in places that are convenient to all stakeholders. The needs of persons with disabilities and non-English speaking persons must be considered for the dissemination of information and the location of public hearings and meetings must be accessible to persons with disabilities. In addition, applicants are required to conduct a community development survey to allow for citizen input on the housing and community needs of the jurisdiction.

Availability of the Citizen Participation Plan

Copies of the CPP may be obtained by visiting~~contacting~~ Commerce's website, http://comdev.mt.gov. Upon request, the State will make the CPP~~lan~~ available in an alternative format accessible to persons with disabilities or non-English speaking persons.

Repositories

Copies of the draft Consolidated Plan documents may be reviewed at the ~~following list of~~ repositories across the state~~,~~ listed below. ~~-~~Except in extenuating circumstances, ~~R~~repositories will have hard copies of the documents available for review during the public comment period~~s only~~. ~~-~~Repositories will~~are~~ not be responsible to receive public comments on the draft documents, as those must be submitted to Commerce as described earlier.

Entity	Address	City
Montana Department of Commerce	301 S Park Ave	Helena
Montana Department of Public Health and Human Services	111 N Last Chance Gulch 5th Floor	Helena
Action for Eastern Montana HRDC Districts I, II, III	2030 N Merrill Ave PO Box 1309	Glendive
Community Action Partnerships of NW Montana HRDC District X	214 Main St PO Box 8300	Kalispell
District IV HRDC	2229 Fifth Ave	Havre
District 6 HRDC	300 1st Ave N #203	Lewistown
District IX HRDC	32 S Tracy Ave	Bozeman
District XI HRC	1801 S Higgins	Missoula
Great Northern Development Corporation	233 Cascade St	Wolf Point
Homeword	1535 Liberty Ln Ste 116A	Missoula
Living Independently for Today and Tomorrow	1201 Grand Ave Ste 1	Billings
Montana Community Development Corporation	229 E Main St	Missoula
Montana Fair Housing	519 E Front St	Butte
Montana Human Rights Bureau	33 S Last Change Gulch	Helena
Montana Independent Living Project	825 Great Northern Blvd Ste 105	Helena
Montana Independent Living Project	3475 Monroe Ste 100	Butte
Montana Independent Living Project	3825 Valley Commons Dr Ste 2	Bozeman
Montana State Library	1515 E Sixth Ave	Helena
Mountain Plains Equity	2101 Overland Ave	Billings
NeighborWorks Montana	509 First Ave S	Great Falls
North Central Independent Living Services	1120 25th Ave North	Black Eagle
Opportunities, Inc. District V HRDC	905 First Ave N	Great Falls
Rocky Mountain Development Council	200 S Cruse	Helena

Appendix B: Fair Housing and Housing & Community Development Surveys

During the development of the Consolidated Plan, Commerce conducted a Fair Housing Survey and a Housing and Community Development Survey. The survey responses are provided at the website below. The information provided is a tally of all responses and a verbatim record of the comments provided for each the survey.

http://housingcdd.mt.gov/CP/cpdocuments.mcpx

Appendix C: 2015-2020 Consolidated Plan Focus Groups Transcripts

During the development of the Consolidated Plan, Commerce conducted four focus group discussions to obtain specific input in areas of interest, these focus groups were called: Community and Public Facilities (appendix C.1), Economic Development (appendix C.2), Affordable Housing (appendix C.3), and Impacts Related to Oil and Gas Development (appendix C.4). Each focus group meeting was transcribed by a court reporter and has been made available at the website below.

http://housingcdd.mt.gov/CP/cpdocuments.mcpx

Appendix D: 2015-2020 Consolidated Plan Development Public Hearing Transcripts

During the development of the Consolidated Plan, Commerce conducted three public meetings to obtain specific input on the development of the Consolidated Plan and the Analysis of Impediments to Fair Housing Choice in Montana. Two public input meetings on the development of the Consolidated plan where held May 22, 2014 (appendix D.1) and July 15, 2014 (appendix D.2). One public meeting on the development of the Analysis of Impediments to Fair Housing Choice in Montana was held July 16, 2014 (appendix C.3). Each public hearing was transcribed by a court reporter and has been made available at the website below.

http://housingcdd.mt.gov/CP/cpdocuments.mcpx

Appendix E: 2015-2020 Consolidated Plan Draft Public Comments and Agency Responses

The public comment period for the Amendment Consolidated Plan and Annual Action Plan Amendments was advertised on March 26, 2020, the public comment period began March 29, 2020, and will end April 28, 2020. A public hearing is scheduled to be held on April 14, 2020, at 11:00 a.m., held as a virtual meeting. The public hearing was announced through the Commerce website, listserv, and multiple newspapers across the state. Once the public comment period ends, a record of the public hearing transcript will be made available through the website below. These comments will be considered, and responses will be provided in Attachment B-1 of the final amendment. See: http://commerce.mt.gov/conplan.

The drafts of the 2015-2020 Consolidated Plan, 2015 Annual Action Plan, and the 2015-2020 Analysis of Impediments to Fair Housing were made available on July 13, 2015 for a 30 day public comment period ending August 12, 2015. Once the public comment period ended a record of the public hearing transcript was made available at the website below. These comments were considered and responses provided in Appendix E of this document.

After the release of the draft Consolidated Plan documents specifically the *2015-2020 Montana Consolidated Plan for Housing and Community Development, 2015 Annual Action Plan*, and *the 2015-2020 Analysis of Impediments to Fair Housing* Commerce received public comments beginning July 13, 2015 for a 30 day public comment period ending August 12, 2015. All comments received were recorded in this appendix and responses provided with the final submission to HUD. This appendix is available at the website below.

http://housingcdd.mt.gov/CP/cpdocuments.mcpx

Summary of Comments Received on the 2015-2020 Consolidated Plan

American Cancer Society

Kristin Page Nei, MT Government Relations Director

American Lung Association (ALA –MT)

Ronni Flannery, Montana Healthy Air Director

Comment:

ALA –MT encourages Commerce to consider adopting a smoke-free requirement as a threshold for all new housing developments receiving grant funds, and provides information about the health risks associated with exposure to secondhand smoke.

Montana Department of Public Health and Human Services (MT-DPHHS)

Jessie Fernandes, MPH, CPH, Montana Asthma Control Program

Crystelle Fogel, MBA, MS, RD, Montana Cardiovascular Program

Sarah Brokaw, Montana Diabetes Program

Mandi Zanto, Montana Nutrition and Physical Activity Program

Heather Beck, Montana Arthritis Program

Comment

MT-DPHHS encourages Commerce to consider adopting a smoke-free requirement as a threshold for all new housing developments receiving grant funds, and provides information about the health and financial benefits of smoke-free housing and the health risks associated with exposure to secondhand smoke.

M+R Strategic Services

John Firehammer, Independent Consultant

Comment:
Mr. Firehammer encourages Commerce to consider the harmful health impact and financial risks of allowing smoking in the units and indoor common areas of projects – restricting smoking behavior in a way that is similar to the Montana Board of Housing's Qualified Allocation Plan.

Agency Response:
Response to 1-3, above: Thank you for the comments. Restrictions regarding smoke-free housing are important to Commerce. Commerce will consider incorporation of these recommendations during the HOME and CDBG application and guidelines update.

North Central Independent Living Services (NCILS)
Shyla Patera, Specialist

Comment:
NCILS encourages Commerce to include policies that

- promote visitability, accessibility, and Universal Design throughout all programs funded with HUD funds;
- allow programs and financing to encourage Montanans with disabilities to become and remain homeowners;
- allow program which allow for affordable and accessible housing repairs to be made.

Agency Response:
Thank you for the comment. These policies are important to Commerce. Commerce will consider incorporation of these recommendations during the HOME and CDBG application and guidelines update.

NeighborWorks Montana & NeighborWorks Great Falls
Sheila Rice, Executive Director

Comment:
1. The plan must be actionable, that is, staff must have the authority to implement sections of the plan in a timely manner.

Agency Response:
Thank you for the comment. The 2015-2020 Consolidated Plan and 2015-2016 Annual Action Plan has established an updated Method of Distribution to create a "one-stop" approach for program processes and procedures. This will result in programmatic efficiencies and effective and consistent policies and procedures within and between these programs.

Comment:
2. The plan must have flexibility to extend contracts if the department cannot act in a timely manner to renew contracts, so the services to those in need of housing are served.

Agency Response:
Thank you for the comment. The 2015-2020 Consolidated Plan and 2015-2016 Annual Action Plan itself can establish no legal authority to extend contracts on behalf of Commerce or Public Health and Human

Services. As stated in the agency response to comment #1, above, Commerce will create programmatic efficiencies concerning this comment.

Comment:

3. The non-competitive programs in HOME and CDBG should be continued in order to maximize the delivery of services throughout the large state of Montana and to impact more areas in a timelier manner.

Agency Response:

Thank you for the comment. As discussed in the 2015-2020 Consolidated Plan and 2015-2016 Annual Action Plan, Commerce intends on continuing with these programs.

Anders Lewendal Construction, Inc.

Anders Lewendal, Owner

Comment:

[Mr. Lewendal] requests discussion about the costs of land, materials, building codes, planning rules and regulations, impact fees, financing barriers, and other issues to bringing project to market.

Agency Response:

Thank you for the comment. Although the comment did not provide specific information, a discussion about the costs of land, materials, labor, building codes, city planning rules and regulations, impact fees, and financing barriers has been added to the Analysis of Impediments to Fair Housing Choice and the Consolidated Plan.

Montana Continuum of Care Coalition

Bob Buzzas, Executive Director

Comment:

1. [Mr. Buzzas] expresses appreciation for close working relationships with State Agencies and the efforts to solicit public input. [Mr. Buzzas] urges the State to continue to emphasize meeting homeless needs in the state.

Agency Response:

Thank you for the comment. The 2015-2020 Consolidated Plan discusses homeless needs and strategies to meeting those needs in detail. The State will continue to work to emphasize these needs as established in the plan.

Comment:

2. [Mr. Buzzas] urges the department to work with state-wide HRDCs to preserve affordable housing units that are susceptible to becoming market-rate units.

Agency Response:

Thank you for the comment. The 2015-2020 Consolidated Plan goals and objectives include partnering and promoting relationships that maintain and retain existing affordable housing through increased coordination and collaboration with all interested parties

HomeWord

Andrea Davis, Executive Director

Comment:

1. The length of time for review and decision impacts other funders decisions and the timing and success of an affordable housing project. We encourage a standard review process that is predictable.

Agency Response:

Thank you for the comment. The 2015-2020 Consolidated Plan and 2015-2016 Annual Action Plan has established an updated Method of Distribution to create a "one-stop" approach for program processes and procedures. This will result in programmatic efficiencies and effective and consistent policies and procedures within and between these programs.

Comment:

2. HomeWord urges the State to reconsider its interpretation of rules and regulations around "low-bid" procurement, allowing alternative such as construction manager at-risk, negotiated bids, etc.

Agency Response:

Thank you for the comment. Commerce has reviewed the applicable state and federal laws and regulations, and has determined that the procurement discussed in the comment will not be utilized at this time.

Summary of Comments Received on the 2015-2020 Analysis of Impediments

Montana Fair Housing (MFH)
Pam Bean, Director

Comment:
1. MFH encourages Commerce to proof carefully.

Agency Response:
Thank you for the comment. The final version of the Analysis of Impediments has corrected grammatical and formatting issues.

Comment:
2. MFH participated in significant ways in the following fair housing cases: US vs. Tamarack, et. al.; MFH vs. Jim and Julie Betty; and MFH vs. Jaclyn Katz and ARESM.

Agency Response:
Thank you for the comment. The Analysis of Impediments to Fair Housing Choice in Montana has been updated to include the additional information about significant ways in which MFH has promoted compliance by participating in the legal process to bring awareness to the issue of discriminatory housing practices.

Comment:
3. MFH received a Fair Housing award of $205,838 for each year: 2015, 2016, & 2017.

Agency Response:
Thank you for the comment. The Analysis of Impediments to Fair Housing Choice in Montana has been updated to include the additional information.

Comment:
4. MFH has a new physical and mailing address: 501 E. Front St, Ste. 504, Butte MT 59701.

Agency Response:
Thank you for the comment. The Analysis of Impediments to Fair Housing Choice in Montana has been updated to include the additional information.

Comment
5. MFH contends that the State fails to understand HUD's intent to correct systemic actions that perpetuate discrimination and that the State's policies and practices also perpetuate discrimination.

Agency Response:
Thank you for the comment. The Analysis of Impediments to Fair Housing Choice in Montana establishes goals and objectives intended to correct barriers to fair housing choice. One of the State's goals is to increase coordination and collaboration with all interested parties. With this goal in mind, the State encourages communication that will provide greater detail as to specific State policies, goals, or objectives that are a concern in order for these to be discussed in the future.

Comment

6. MFH works with State departments, providing training to further Fair Housing, but contends that actions on the part of state agencies have conflicted with MFH events; the Board of Realty Regulation refuses to approve credits for the MFH annual conference; and State agencies will not reimburse travel costs for MFH presentations at State events.

Agency Response:

Thank you for the comment. The State of Montana considers MFH a strong partner in promoting Fair Housing and providing Fair Housing training and will consider these comments as opportunities arise and through the State's goal of increasing coordination and collaboration with all interested parties.

Comment:

7. The State, by encouraging the establishment of local fair Housing offices, may divert sources away from enforcement activities despite current threats to fair housing funds and in so doing, may create conflicts of interest and a limited ability to address systemic violations.

Agency Response:

Thank you for the comment. The State is unaware of any instances where it has encouraged the establishment of local fair housing offices. Additionally, the Analysis of Impediments to Fair Housing Choice in Montana Action 1.1 discussed working with fair housing organizations as part of the fair housing infrastructure. This Action item has been updated to clarify Action 1.1.

Comment

8. MFH contends that the State's method focuses almost solely on outreach and education, but should address and correct systemic violations to Affirmatively Further Fair Housing Policies and procedures should be evaluated.

Agency Response:

Thank you for the comment. The State's efforts to educate the public and housing stakeholders are an effort to prevent housing discrimination before it happens. Additionally, the Analysis of Impediments to Fair Housing Choice in Montana included an objective to establish qualitative and quantitative analysis. Without greater detail on the 'systemic violations', it is difficult to determine what policies and procedures are problematic. The State has also established goals and objectives intended to correct barriers to fair housing choice. One of the State's goals is to increase coordination and collaboration with all interested parties. With this goal in mind, the State encourages communication that will provide greater detail as to specific State policies, goals, or objectives that are a concern in order for these to be discussed in the future.

AWARE

Michael O'Neill, Program Officer

Comment:

1. A number of tables in the Analysis of Impediments online have data that is illegible.

Agency Response:

Thank you for the comment. The Analysis of Impediments to Fair Housing Choice in Montana has been updated to remedy this comment.

Comment

2. AWARE has reports of landlords putting the responsibility for disability accommodation on the tenant with the disabling condition. Is there a section in the AI on issue of reasonable accommodations and reasonable modifications for people with disabilities, particularly with therapeutic animals and support animals?

Agency Response:

Thank you for the comment. The failure by property owners and managers to provide reasonable accommodations is discussed throughout the Analysis of Impediments, and is identified as one of the primary impediments to Fair Housing choice. While a specific discussion on therapeutic animals or support animals was not included as part of the Analysis of Impediments to Fair Housing Choice in Montana document, the State has established goals and objectives intended to correct barriers to fair housing choice through increased coordination and collaboration with all interested parties. With this goal in mind, the State encourages communication that will impact data and information as the goals and objectives are implemented in the future.

District XI Human Resource Council (Dist. XI HRC)

Jim Morton, Executive Director

Comment:

1. Did the State include any reference to disparate impact, such as the kinds of impact that some property managers have had on applicants using different pieces of information like credit scores, which then sometimes eliminates people of lower income status, persons with a disability, or minorities?

Agency Response:

Thank you for the comment. The potentially disparate impact to minorities and women from the use of a person's credit score as a measure of lending risk is discussed. The Analysis of Impediments to Fair Housing Choice in Montana included an objective to establish qualitative and quantitative analysis as well as increased coordination and collaboration with all interested parties. With these goals in mind, the State encourages communication that will impact the implementation of the goals and objectives established by the State.

Comment:

2. Dist. XI HRC requests the Department provide educational opportunities about disparate impact.

Agency Response:

Thank you for the comment. The Analysis of Impediments to Fair Housing Choice in Montana included a goal to support and conduct fair Housing education and training opportunities. The State will consider these comments as opportunities arise and information specific to disparate impact becomes available.

North Central Independent Living Services (NCILS)

Shyla Patera, Specialist

Comment:

1. NCILS encourages Commerce to include policies that combat housing discrimination.

Agency Response:
Thank you for the comment. The Analysis of Impediments to Fair Housing Choice in Montana included an objective to establish qualitative and quantitative analysis as well as increased coordination and collaboration with all interested parties. With these goals in mind, the State encourages communication that will impact the implementation of the goals and objectives established by the State.

Anders Lewendal Construction, Inc.
Anders Lewendal, Owner

Comment:
[Mr. Lewendal] requests discussion about the costs of land, materials, building codes, planning rules and regulations, impact fees, financing barriers, and other issues to bringing project to market.

Agency Response:
Thank you for the comment. Although the comment did not provide specific information, a discussion about the costs of land, materials, labor, building codes, city planning rules and regulations, impact fees, and financing barriers has been added to the Analysis of Impediments to Fair Housing Choice and the Consolidated Plan.

Appendix F: 2015-2020 Consolidated Plan and Analysis of Impediments Draft Documents Public Hearing Transcripts

The public comment period for the Amendment Consolidated Plan and Annual Action Plan Amendments was advertised on March 26, 2020, the public comment period began March 29, 2020, and will end April 28, 2020. A public hearing is scheduled to be held on April 14, 2020, at 11:00 a.m., held as a virtual meeting. The public hearing was announced through the Commerce website, listserv, and multiple newspapers across the state. Once the public comment period ends, a record of the public hearing transcript will be made available through the website below. These comments will be considered, and responses will be provided in Attachment B-1 of the final amendment. See: http://commerce.mt.gov/conplan.

After the release of the draft Consolidated Plan documents specifically the *2015-2020 Montana Consolidated Plan for Housing and Community Development, 2015 Annual Action Plan*, and *the 2015-2020 Analysis of Impediments to Fair Housing* Commerce conducted two public meetings to obtain specific input on the draft document. The first public hearing was held July 29, 2015 at 11:30 a.m. regarding the *2015-2020 Analysis of Impediments to Fair Housing;* the second public hearing regarding the *2015-2020 Montana Consolidated Plan for Housing and Community Development* and *2015 Annual Action Plan* on July 29, 2015 at 1:00 p.m., both held in room 266 & 228 at 301 South Park Ave, Helena MT, 59602. Each public hearing was available via webinar and conference call to encourage public participation. Each public hearing was transcribed by a court reporter and is made available at the website below.

http://housingcdd.mt.gov/CP/cpdocuments.mcpx

Appendix G: 2015-2020 Consolidated Plan Outreach

During the planning process for the 2015-2020 Montana Consolidated Plan numerous outreach attempts were made in order to encourage public participation. Electronic Outreach was conducted by Commerce in two distinct manners: via email and by website postings.

Commerce sent out invitations for participation and reminders via email. Each email was sent out to approximately of 1300 addresses. These addresses included members of the public, city, town and county officials, independent and professional consultants, for-profit entities and businesses, non-profit entities and businesses, state and federal agencies, and various other organizations. A full list of these non-citizen entities contacted is as follows:

Accessible Space
Action for Eastern Montana
All Pro Rental
American Federal Savings Bank
Anaconda Deer Lodge County
Anaconda Job Service
Arcade MHSB
Arizona Department of Housing
Arkansas Development Finance Authority
Association for Corporate Growth
Bank of Baker
Bank of the Rockies
Baucus Senate Office
Bear Paw Development
Beaverhead County
Begley Law
Belgrade Chamber of Commerce
Big Sky Bank
Big Sky Brokers
Big Sky Civil & Environmental
Big Sky Economic Development
Bigfork Chamber of Commerce
Bighorn County
Billings Housing Authority
Blackfoot Commissioner
Blaine County
Bosley Management
Broadwater County Commissioner
Brosz Engineering, Inc.
Butte Housing Authority
California Housing Finance Authority
Carbon County
Carbon County Commissioner
Cardinal Properties
Career Training Institute
Cascade County Commissioner
Christenson Corporation
Citizens Bank
City Clerk of Forsyth
City Clerk of Froid
City Clerk of Fromberg
City Clerk of Hardin
City Clerk of Hot Springs
City Clerk of Laurel
City Clerk of Miles City
City Clerk of Ronan
City Manager of Livingston
City of Belgrade
City of Billings
City of Bozeman
City of Butte
City of Colstrip
City of Conrad
City of Culbertson
City of Ennis
City of Glasgow
City of Hamilton
City of Lewistown
City of Libby
City of Livingston
City of Missoula
City of Plentywood
City of Poplar
City of Shelby
City of Stevensville
City of Three Forks
City of Townsend
City of Troy
City of Whitefish
City of Wolf Point
City of Yellowstone
Civic Consulting
Civil Deputy of Park County
Community Bank
Community Bank of Missoula
Community First Bank

County of Silver Bow
County Recorder Prairie County
Crow Tribe Apsaalooke Nation
CTA Architect
Cutbank Chamber of Commerce
Dawson County
Dawson County Attorney
Delaware State Housing Authority
Department of Administration
Department of Commerce
Department of Corrections
Department of Justice
Department of Military Affairs
Department of Revenue
Department of Environmental Quality
Dillon Job Service
District of Columbia Housing Finance Agency
Division of Housing and Community Renewal
Eagles Manor
East Helena City Council
Enterprise Community Partners
Environmental Protection Agency
Eureka Police Department
Eureka Rural Development
Fallon County Commissioner
Fallon County Planner
Farmers Bank
Fergus County
Fergus County Commissioner
First Citizens Bank
First Community Bank
First Interstate Bank
First Montana Bank
First Premier Bank
First Security Bank
First Security Bank Missoula
First State Bank Missoula
First State Bank of Forsyth
Fish, Wildlife and Parks
Flathead Bank
Flathead County
Flathead Valley Community College
Florida Housing Authority
Flynn Consulting
Fort Peck Tribes
Gallatin County Commissioner
George K. Baum & Company
Georgia Department of Community Affairs
Gerrard Corporation
Glacier Bank
Glasgow Job Service
Glendive Job Service
Global Montana
GMAC Mortgage
Grand Peaks Property Management
Granite County Commissioner
Great Falls Housing Authority
Great Falls Job Service
Great Northern Development Corporation
Great West Engineering
Guild Mortgage Co.
Habitat for Humanity of Missoula
HAD Management Billings
Hamilton Job Service
Havre Job Service
Heartland Realty Investors
Helena Chamber of Commerce
Helena Housing Authority
Helena Job Service
Helena Property Rentals
Helena USF&G
Homeward
Housing and Community Services
HRC District IX
HRC District XI
HRDC
HRDC District VII
Housing and Urban Development
Idaho Housing and Finance Association
Independence Bank
Infinity Property Management
Interstate Engineering
Investors Capital Group, LLC.
Jackson, Murdo & Grant, P.C.
Judith Basin County
Kalispell Job Service
Kaplan & Breck PC
Kentucky Housing Authority
Kutka Rock LLP
LA&CE Peaks to Plains
Lake County Commissioner
Legion Oasis Apartments
Legislative House
Lewis & Clark County
Lewistown Job Service
Libby Job Service
Liberty Job Service
Liberty County Commissioner
LIFTT
Little Big Horn College
Livingston Job Service
Luxan & Mirfitt PLLP
Macek Companies
Madison County
Manhattan Bank
Mann Mortgage Montana

Maryland Housing Authority
Mayor of Dillon
Mayor of Laurel
Mayor of Miles City
Mayor Staff of Missoula
Meagher County
Mid-Rivers Communications
Miles City Job Service
Miles Community College
Mineral County
Mineral County Commissioner
Missoula Aging Services
Missoula County
Missoula Federal Credit Union
Missoula Housing
Missoula Job Service
Montana Associated Technology Roundtables
Montana Association of Conservation Districts
Montana Coalition for the Homeless
Montana Community Finance
Montana Cooperative Development Center
Montana Credit Union Network
Montana Department of Transportation
Montana Environmental Information Center
Montana Fair Housing
Montana Independent Living Project
Montana Municipal Insurance Authority
Montana Newspaper Association
Montana Professional Consultants Inc.
Montana Rural Employment Opportunities
Montana State University
Montana Plains Equity Group
Mountain View Apartments
Mountain View Apartments
Mountain West Bank
Musselshell County
NAMI Montana
National Affordable Housing Network
National Development Council
Nationwide Property Management
NCI Engineering
Nebraska Investment Finance Authority
NeighborWorks Great Falls
NeighborWorks Montana
NetMore America, Inc.
New Hampshire Housing Finance Authority
New Mexico Housing Authority
New York City Housing Development Corp
Nittany Grantworks
North Carolina Housing Finance Agency
Ohio Housing Finance Authority
Oklahoma Housing Finance Authority
One Economy Corporation
Opportunities Inc. Great Falls
Pacific Companies
Park County Commissioner
Pennsylvania Housing Finance Agency
Phillips County Commissioner
Pioneer Federal Bank
Polson Job Service
Powder River County
Powder River Manor
Powell County
Professional Property Management
Ravalli County
Ravalli County Economic Development Authority
Reach Inc.
Rent Helena
Residential Support Services
Resource Support and Development
Rhode Island Housing Authority
Richland County
Riverstone Residential Group
RK Properties
Robert Peccia and Associates
Rocky Affordable Housing Management Association
Rocky Mountain Development Council
Ronan Housing Authority
Roosevelt County
Rosebud County
Rural Community Assistance Corporation
Salish & Kootenai Housing Authority
Sanders County
Sapphire Lutheran Homes
Scott Hart Building Animal Health
Second Chance Homes MT
Shelby Job Service
Sheridan County
Sheridan County Commissioner
Simpson Housing
Sirius Construction
Small Business Administration
Social Security Administration
South Carolina Housing Authority
South Dakota Housing Development Authority
Southeastern Montana Development Corporation
Sparrow Management
St. John Lutheran Ministries
Stahly Engineering
State Bank of Townsend
Steadfast Companies
Sterling Savings Bank
Stillwater County Commissioner
Stockman Bank
Streeter Brothers Inc.
Summit Independent Living Center Inc.

Susan Swinley Attorney
Syringa Property Management
Tamarack Property Management
TD&H Engineering
Tester Senate
Texas Department of Housing and Community Affairs
Thies & Talle Management
Thomas Development
Thompson Falls Job Service
Town of Manhattan
Town of Nashua
Town of Opheim
Town of Pinesdale
Town of Rexford
Town of Saco
Town of Superior
Town of Valier
Town of Whitehall
United Bank of Montana
United States Army Corps of Engineers
University of Montana
US Bank
US Department of Agriculture
Utah Housing Corporation
Valley Bank of Helena
Valley Bank of Ronan
Valley County
Virgin Islands Housing Finance Authority
Virginia Housing Development Authority
Waddell & Reed Inc.
Warehouse Department
Washington State Housing Finance Commission
Water Resources Department
Wells Fargo
West Mont
Western Law
Western Montana Mental Health Center
Western Security Bank
Whitefish Lake Institute
Wisconsin Housing and Economic Development
Wolf Point Job Service
Workers Compensation
WWC Engineering
Wyoming Community Development Authority
Yellowstone Bank
Youth Homes Inc.
YWCA of Missoula

Appendix H: Additional Data

Montana's Population by Race and Ethnicity

As the population of Montana grew between 2000 and 2010, the racial and ethnic composition of the state underwent a slight shift. Overall, the population grew by 9.7 percent during that time, though different racial and ethnic groups within the overall population grew at different rates. The white population, which accounted for the largest proportion of Montanans in both years, grew by 8.3 percent. This rate was lower than the overall growth rate, meaning that the white population comprised a smaller proportion of the population in 2010 than it had in 2000. The racial category with the largest rate of change in the past decade was the category for persons of two or more races. That category grew by 58.8 percent. This was followed by blacks, with a change of 49.6 percent.

The Hispanic population grew at a faster rate than the non-Hispanic population. In 2000, Hispanic residents accounted for 2.0 percent of the population. After experiencing a rate of growth of 58.0 percent between 2000 and 2010, the Hispanic population came to account for almost three percent of the total population. Meanwhile, the non-Hispanic population only grew by 8.7 percent and the proportion of non-Hispanic Montana residents fell by almost one percentage point.

Table H.1
Population by Race and Ethnicity
State of Montana
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	817,229	90.6%	884,961	89.4%	8.3%
Black	2,692	0.3%	4,027	0.4%	49.6%
American Indian	56,068	6.2%	62,555	6.3%	11.6%
Asian	4,691	0.5%	6,253	0.6%	33.3%
Native Hawaiian/ Pacific Islander	470	0.1%	668	0.1%	42.1%
Other	5,315	0.6%	5,975	0.6%	12.4%
Two or More Races	15,730	1.7%	24,976	2.5%	58.8%
Total	**902,195**	**100.0%**	**989,415**	**100.0%**	**9.7%**
Non-Hispanic	884,114	98.0%	960,850	97.1%	8.7%
Hispanic	18,081	2.0%	28,565	2.9%	58.0%

While the white population saw modest growth that did not keep pace with the state's overall growth, the black population saw a doubling of its population numbers. All other minorities saw a faster than average growth during this time period as well. The Asian and Native Hawaiian/Pacific Islander populations saw growth rates exceeding four times the average growth rate, although these populations remain relatively small. The second overall fastest growing group were those who identified as two or more races, with a 91.20 percent growth rate. The Hispanic population also outpaced the average growth rate, with an increase of 86.30 percent between 2000 and 2013.

Table H.2
Intercensal Population Estimates by Race and Ethnicity
State of Montana
Intercensal and Current Estimates Census Data, 2000 - 2013

Year	White	Black	American Indian	Asian	Native Hawaiian/ Pacific Islander	Two or More Races	Total	Hispanic
2000	824,269	2,813	56,355	4,806	488	13,469	902,200	18,084
2001	826,639	3,154	57,048	5,119	538	14,463	906,961	19,546
2002	829,714	3,372	57,582	5,225	564	15,210	911,667	20,622
2003	835,759	3,619	58,241	5,339	585	16,087	919,630	21,814
2004	844,155	3,863	58,900	5,561	642	16,888	930,009	22,766
2005	852,189	3,899	59,782	5,685	641	17,906	940,102	24,153
2006	862,738	4,107	60,364	5,857	695	18,931	952,692	25,301
2007	872,545	4,192	61,181	6,034	731	20,023	964,706	26,440
2008	882,291	4,282	61,852	6,205	732	21,053	976,415	27,373
2009	887,526	4,354	62,711	6,429	787	22,175	983,982	28,210
2010	891,529	4,215	63,495	6,379	734	23,063	989,415	28,565
2011	896,292	5,128	64,654	6,931	778	23,817	997,600	30,569
2012	901,375	5,828	65,515	7,364	790	24,622	1,005,494	32,160
2013	908,671	5,860	66,256	7,776	854	25,748	1,015,165	33,689
Percent Change 00-13	**10.20%**	**108.30%**	**17.60%**	**61.80%**	**75.00%**	**91.20%**	**12.50%**	**86.30%**

Geographic analysis of racial distribution was conducted by calculating the percentage share of total population within each census tract of the particular sub-population; i.e., racial or ethnic group. That share was then plotted on a geographic map. The goal of this analysis was to identify areas with disproportionate concentrations of each sub-population. HUD defines a population as having a disproportionate share when a portion of a population is more than 10 percentage points higher than the jurisdiction average. For example, the white population accounted for 89.4 percent of the total population of the State in 2010—accordingly, the disproportionate share threshold for that population was 99.4 percent in that year. Any areas in which more than 99.4 percent of the population was white were therefore said to hold a disproportionate share of white residents.

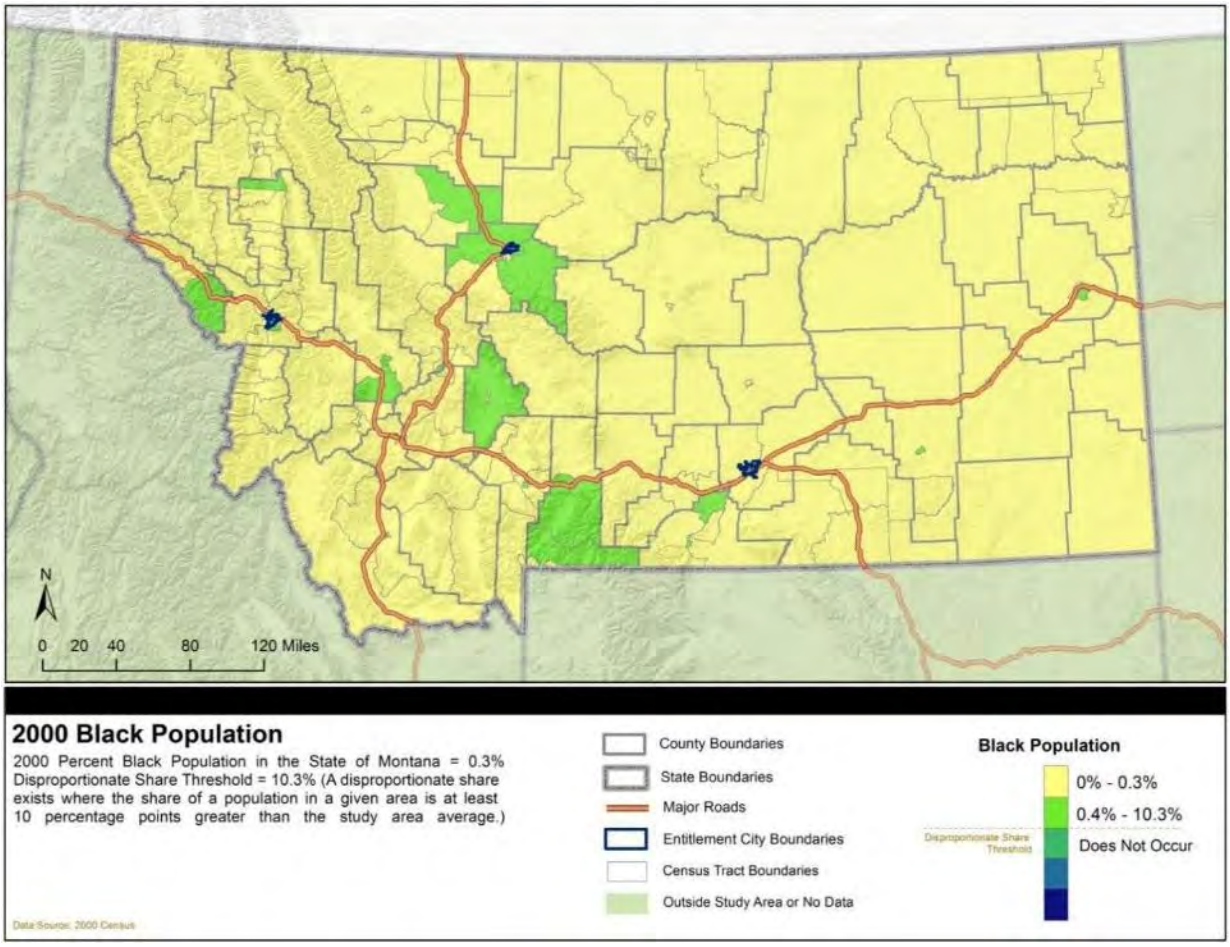
In the year 2000, white residents accounted for 90.6 percent of the population of Montana. Due to the high proportion, a disproportionate share of whites is not possible as it exceeds 100 percent.

By 2010 the white population had grown by 8.3 percent since 2000, which was below the state rate of 9.7 percent. This left the white population with a lower proportion of the population, with 89.4 percent of Montanans. The disproportionate share of whites in 2010 would be 99.4 percent; no census tracts saw a disproportionate share of white persons in 2010.

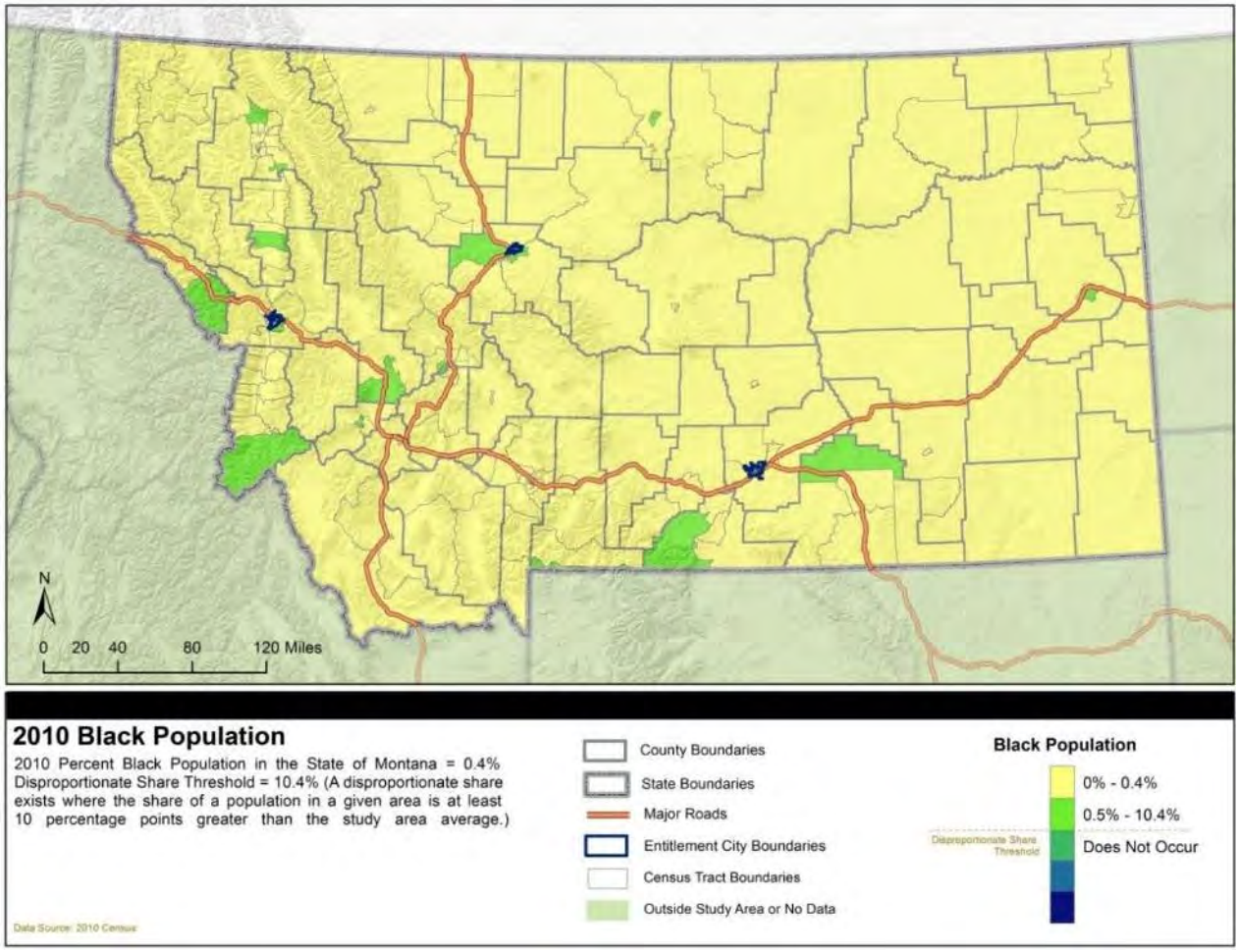
By contrast, the black population accounted for only 0.3 percent of the population in 2000. While the state saw no areas with disproportionate share of blacks, some areas had higher concentrations of black residents. This is shown in Map Appendix H.1.

Similarly, in 2010, the black population in 2010 did not present disproportionate share in any areas throughout the state. The black population did outpace the state average growth, having a 49.6 percent increase between 2000 and 2010. Looking at Map H.2, areas with higher levels of black residents shifted slightly between 2000 and 2010.

Map H.1
Percent Black Population by Census Tract
State of Montana
2000 Census Data



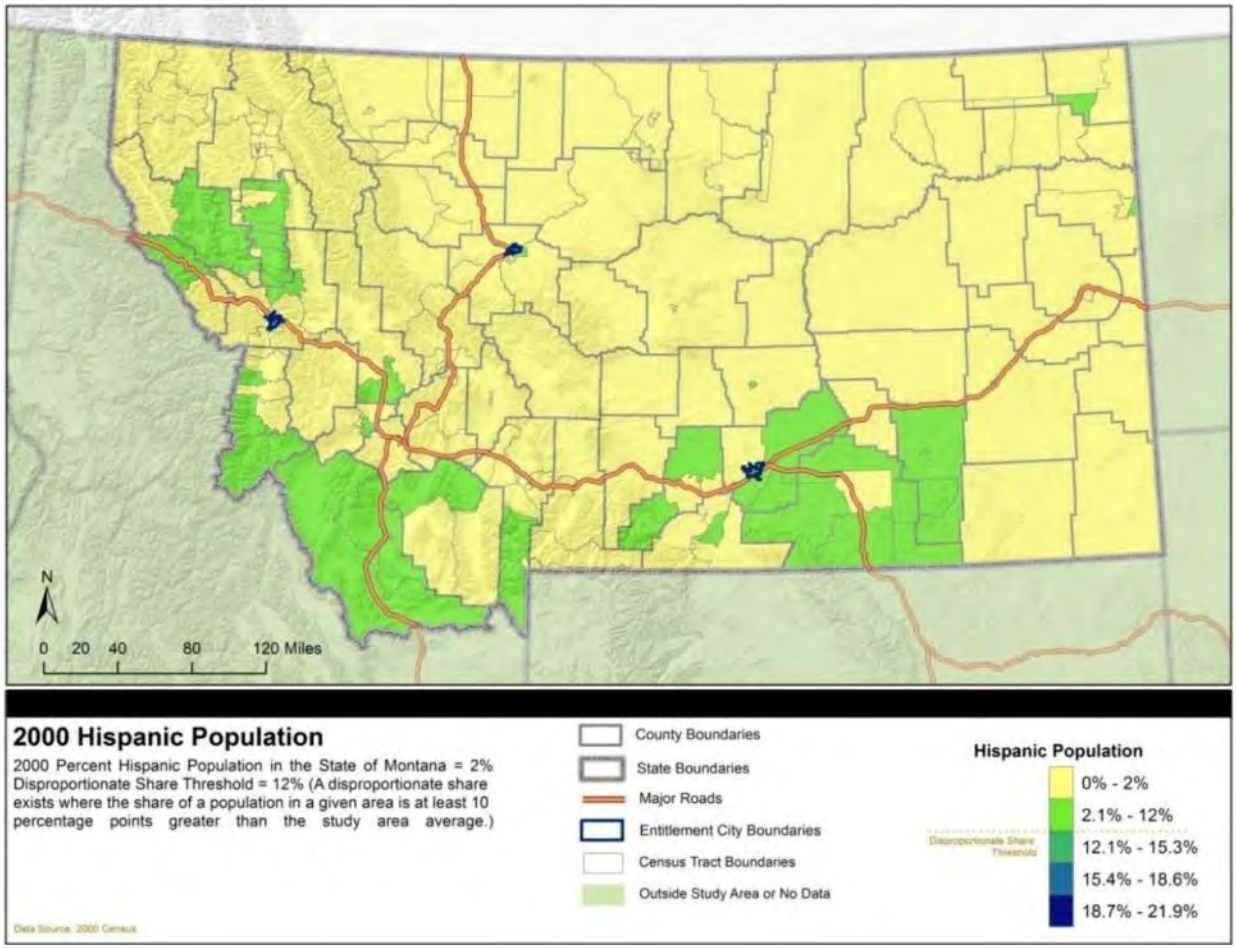
Map H.2
Percent Black Population by Census Tract
State of New Montana
2010 Census Data



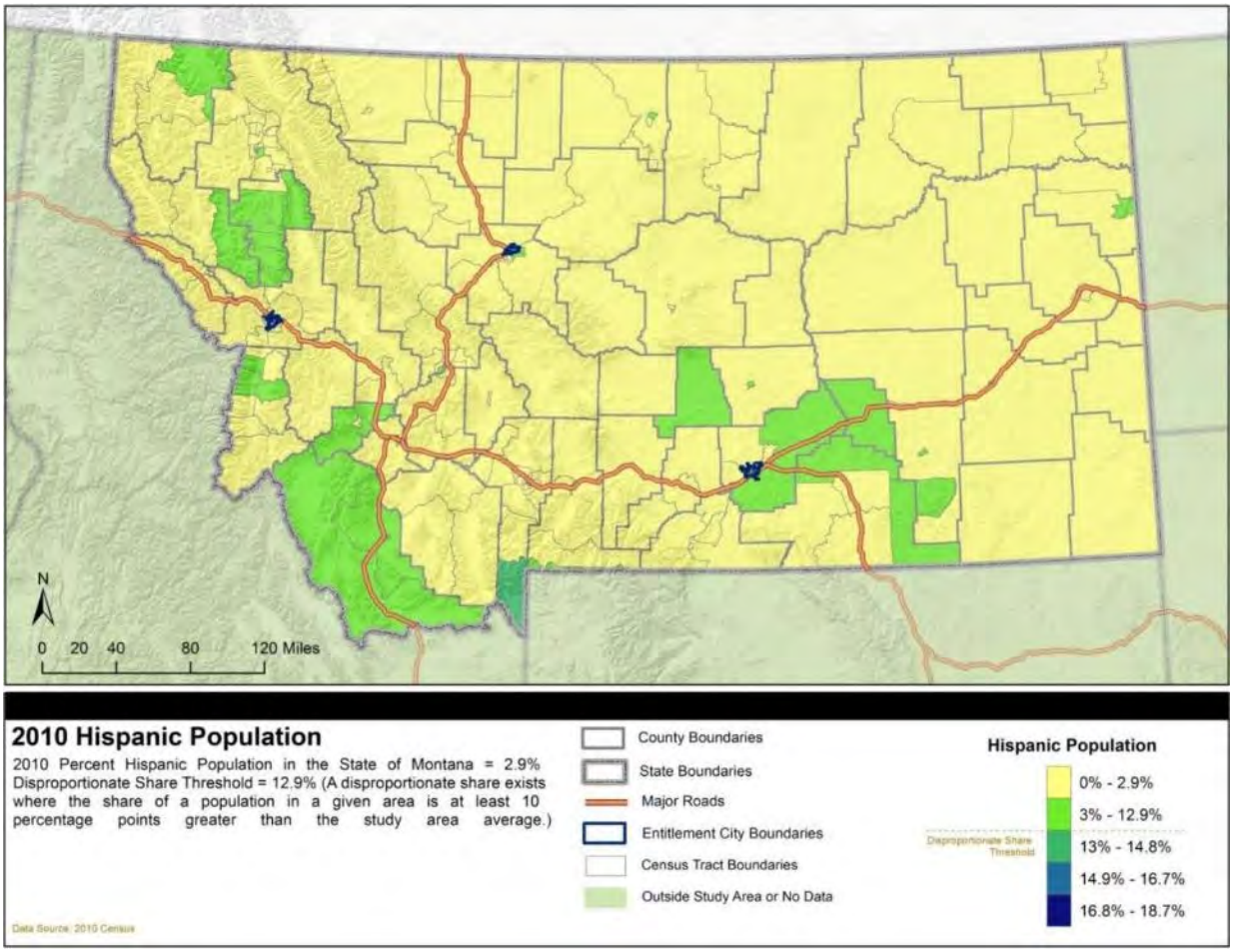
Hispanic populations in 2000 and 2010 are shown in the maps. Between 2000 and 2010 there was not a significant change in areas of concentration for Hispanic populations. Higher concentrations were around larger cities, with the vast majority of the state containing less than 2.9 percent of the population as Hispanic in 2010. One Census tract had a disproportionate share of Hispanics in 2010, as was located on the southern edge of the state. Otherwise, no other areas had a disproportionate share of Hispanics.

The American Indian population was largely concentrated in and around tribal trust and reservation lands of the state in both 2000 and 2010, as seen in Maps H.5 and H.6. However in 2010, there is a larger expansion of American Indian households into areas surrounding Tribal reservations. All other areas that were not adjacent to reservations did not have American Indian populations greater than 6.3 percent.

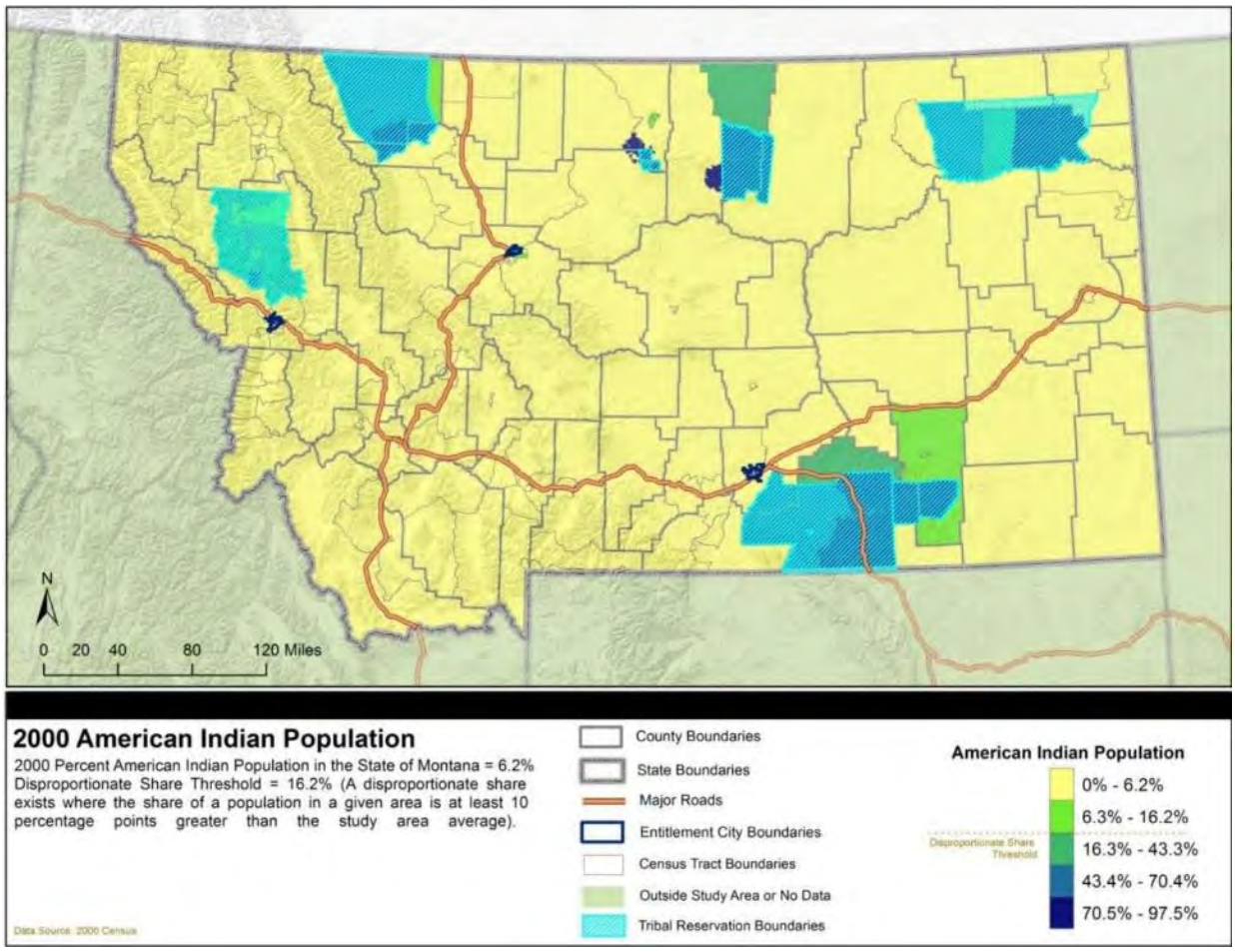
Map H.3
2000 Hispanic Population
State of Montana
Census Bureau 2000



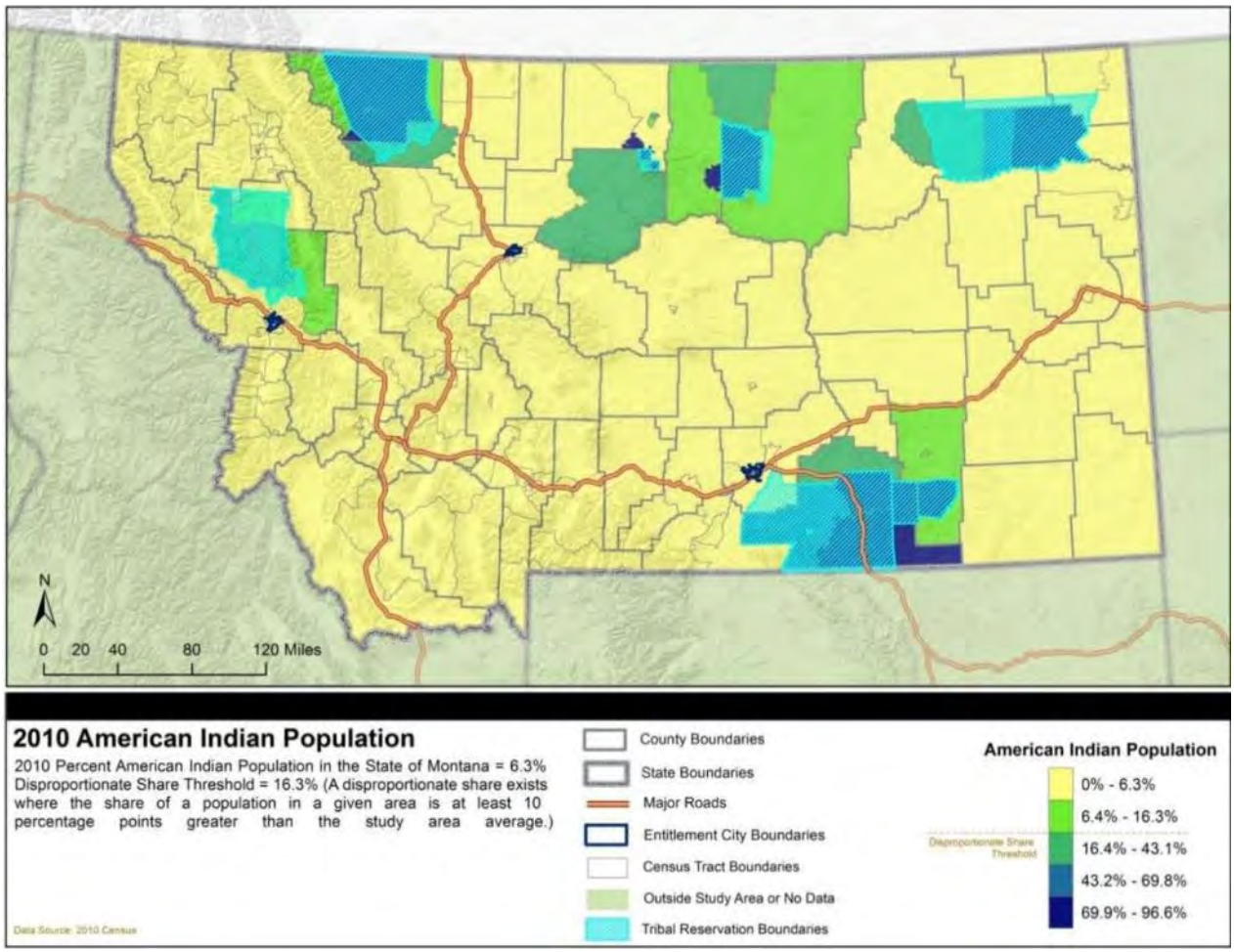
Map H.4
2010 Hispanic Population
State of Montana
Census Bureau 2010



Map H.5
2000 American Indian Population
State of Montana
Census Bureau 2000



Map H.6
2010 American Indian Population
State of Montana
Census Bureau 2010



A. Population by Age

The State of Montana experienced a shift in the population between 2000 and 2010 as growth in the number of older residents generally outpaced growth in the number of younger residents. The fastest-growing age cohort during this time period was composed of residents between the ages of 55 and 64; this cohort grew by 63.1 percent between 2000 and 2010. Similarly, the cohort of persons aged 65 and older grew by 21.3 percent over the decade and represented 14.8 percent of the overall population in 2010. By contrast, the cohorts of residents aged 5 to 19 years and 35 to 54 years all had negative rates of change, reflecting a net decline in these age groups. While the largest age cohort in both Census counts was composed of residents aged between 35 and 54 years of age, it decreased from being 30.7 percent of the population in 2000 to 26.6 percent in 2010.

Table H.3
Population by Age
State of Montana
2000 & 2010 Census SF1 Data

Age	2000 Census	2010 Census	% Change 00–

	Population	% of Total	Population	% of Total	10
Under 5	54,869	6.1%	62,423	6.3%	13.8%
5 to 19	202,571	22.5%	188,613	19.1%	-6.9%
20 to 24	58,379	6.5%	67,138	6.8%	15.0%
25 to 34	103,279	11.4%	122,864	12.4%	19.0%
35 to 54	277,029	30.7%	262,777	26.6%	-5.1%
55 to 64	85,119	9.4%	138,858	14.0%	63.1%
65 or Older	120,949	13.4%	146,742	14.8%	21.3%
Total	**902,195**	**100.0%**	**989,415**	**100.0%**	**9.7%**

Intercensal population estimates of yearly populations by age group bear out the shift toward an older Montanan population, and reveal that this trend appears to have continued since the 2010 Census. According to these estimates, residents over the age of 65 grew by 36.23 percent through 2013. Growth was even more rapid among residents aged between 55 and 64 years; this cohort grew by 75.23 percent between 2000 and 2013. By contrast, cohorts of persons aged 25 to 44 and 45 to 54 declined during this time period. The number of persons aged 25 to 44 was increasing until 2006, then has been steadily declining, reaching a total of 3,000 persons less in 2013 than in 2010. Persons aged 45 to 54 increased in numbers until 2007, then began to decline steadily through 2013.

Table H.4
Intercensal Population Estimates by Age
State of Montana
Intercensal and Current Estimates Census Data, 2000 - 2013

Age	Under 14 years	15 to 24 years	25 to 44 years	45 to 54 years	55 to 64 years	65 & over	Total
2000	186,131	129,690	245,217	135,092	85,119	120,951	902,200
2001	183,089	133,372	238,899	140,941	88,135	122,525	906,961
2002	181,177	135,506	234,222	143,136	93,830	123,796	911,667
2003	179,948	138,559	230,567	146,358	98,903	125,295	919,630
2004	179,744	139,711	229,675	148,742	104,861	127,276	930,009
2005	179,004	141,303	228,195	151,320	110,849	129,431	940,102
2006	179,539	141,748	228,548	153,021	117,054	132,782	952,692
2007	180,806	139,293	231,371	153,740	123,481	136,015	964,706
2008	182,632	138,276	233,215	153,172	128,789	140,331	976,415
2009	183,628	135,694	234,399	151,768	134,566	143,927	983,982
2010	184,312	133,862	235,809	149,832	138,858	146,742	989,415
2011	184,560	135,464	237,249	144,284	144,955	151,088	997,600
2012	185,105	136,831	239,022	139,485	146,787	158,264	1,005,494
2013	186,272	137,992	242,135	134,842	149,156	164,768	1,015,165
Percent Change 00-13	**0.08%**	**6.40%**	**-1.26%**	**-0.19%**	**75.23%**	**36.23%**	**12.52%**

The Elderly

The elderly population is defined by the Census Bureau as comprising any person aged 65 or older. As noted in the 2000 Census data, 120,949 persons in Montana were considered elderly; by 2012 there were 146,742 elderly persons in the state.Table H.5 segregates this age cohort into several smaller groups. This table shows that those aged 70 to 74 comprised the largest age cohort of the elderly population in Montana in 2010 at 34,186 persons, followed by the age groups of 67 to 69 with 26,745 persons. Between 2000 and 2010, the most growth occurred in those aged 65 to 66, with a 49.2 percent increase, followed by those aged 67 to 69 with a 38.8 percent increase. The elderly population, as a whole, has seen the second most amount of growth between 2000 and 2010. The number of persons over 65 grew by 21.3 percent over that decade. The fastest growing group during that timeframe was persons aged 58 to 64, indicating that the elderly population will continue to grow at an increasing rate in the future.

Table H.5
Elderly Population by Age
State of Montana
2000 & 2010 Census SF1 Data

Age	2000 Census Population	% of Total	2010 Census Population	% of Total	% Change 00–10
65 to 66	13,279	11.0%	19,811	13.5%	49.2%
67 to 69	19,262	15.9%	26,745	18.2%	38.8%
70 to 74	29,978	24.8%	34,186	23.3%	14.0%
75 to 79	24,703	20.4%	25,637	17.5%	3.8%
80 to 84	18,390	15.2%	20,342	13.9%	10.6%
85 or Older	15,337	12.7%	20,021	13.6%	30.5%
Total	**120,949**	**100.0%**	**146,742**	**100.0%**	**21.3%**

The Frail Elderly

The elderly population also includes those who are considered to be frail elderly, defined as elderly persons whose physiological circumstances may limit functional capabilities; this is often quantified as those who are 85 years of age and older. Information below shows that there were 20,021 persons aged 85 or older in Montana at the time of the 2010 Census.

B. Persons with Disabilities

Disability is defined by the Census Bureau as a lasting physical, mental or emotional condition that makes it difficult for a person to do activities, to go outside the home alone or to work. By this definition, 145,732 Montana residents were considered to be living with some form of disability in 2000. This figure was lower than the national average for that time of about 19.3 percent[80]. There were 8,191 persons aged 5 to 15 with disabilities, 92.257 persons between the age of 16 and 64 with a disability and 45,284 persons over the age of 65 with a disability at that time.[81]

Table H .6
Disability by Age
State of Montana
2000 Census SF3 Data

Age	Total Disabled Population	Disability Rate
5 to 15	8,191	5.6%
16 to 64	92,257	16.1%
65 and older	45,284	39.6%
Total	**145,732**	**17.5%**

[80] 2000 Census SF3 Data, available from http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_00_SF3_QTP21&prodType=table

[81] The data on disability status was derived from answers to long-form questionnaire items 16 and 17 for the 1-in-6 sample. Item 16 asked about the existence of the following long-lasting conditions: (a) blindness, deafness, or a severe vision or hearing impairment, (sensory disability) and (b) a condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying (physical disability). Item 16 was asked of a sample of the population five years old and over. Item 17 asked if the individual had a physical, mental, or emotional condition lasting 6 months or more that made it difficult to perform certain activities. The four activity categories were: (a) learning, remembering, or concentrating (mental disability); (b) dressing, bathing, or getting around inside the home (self-care disability); (c) going outside the home alone to shop or visit a doctor's office (going outside the home disability); and (d) working at a job or business (employment disability). Categories 17a and 17b were asked of a sample of the population five years old and over; 17c and 17d were asked of a sample of the population 16 years old and over. For data products which use the items individually, the following terms are used: sensory disability for 16a, physical disability for 16b, mental disability for 17a, self-care disability for 17b, going outside the home disability for 17c, and employment disability for 17d. For data products which use a disability status indicator, individuals were classified as having a disability if any of the following three conditions was true: (1) they were five years old and over and had a response of "yes" to a sensory,

According to the American Community Survey, an estimated 13.1 percent of state residents were living with some form of disability by 2012. Disability rates tended to be higher for male than for female residents, and higher for elderly residents than for younger residents. More than 50 percent of residents of either sex over the age of 75 were observed to be living with a disability in 2012, and disability rates fell progressively in lower age ranges.

Table H.7
Disability by Age
State of Montana
2012 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	155	.5%	188	.6%	343	.6%
5 to 17	5,059	6.1%	3,188	4.1%	8,247	5.1%
18 to 34	7,481	6.9%	5,467	5.3%	12,948	6.1%
35 to 64	28,874	14.6%	24,357	12.2%	53,231	13.4%
65 to 74	12,068	30.2%	8,913	22.1%	20,981	26.1%
75 or Older	14,191	52.2%	17,862	50.2%	32,053	51.1%
Total	**67,828**	**13.9%**	**59,975**	**12.3%**	**127,803**	**13.1%**

However, there were several counties within the state that tended to have higher concentrations of persons with disabilities; as shown in Map H.7. These counties are spread throughout the state, but with a larger grouping on the western side of the state. One Census tract on the western side of the state had a disproportionate share of persons with disabilities in 2000.

C. Group Quarters Population

The Census Bureau defines group quarters as "places where people live or stay in a group living arrangement, which are owned or managed by an entity or organization providing housing and/or services for the residents[82]." The group quarters population is further divided into two overall categories:

- **The institutionalized population** includes persons under formally authorized supervised care or custody, such as those living in correctional institutions, nursing homes, juvenile institutions, halfway houses, mental or psychiatric hospitals, and wards.
- **The non-institutionalized population** includes persons who live in group quarters other than institutions, such as college dormitories, military quarters or group homes. These latter settings include community-based homes that provide care and supportive services, such as those with alcohol and drug addictions. This particular category also includes emergency and transitional shelters for the homeless.[83]

The number of residents living in group quarters in Montana rose from 24,762 in 2000 to 28,849 in 2010, a growth of 16.5 percent. Much of this growth was driven by the rising number of Montanans in Non-institutionalized

physical, mental or self-care disability; (2) they were 16 years old and over and had a response of "yes" to going outside the home disability; or (3) they were 16 to 64 years old and had a response of "yes" to employment disability.

[82] *2010 Census Summary File: Technical Documentation*. Issued September 2012. Page B-14. Available at http://www.census.gov/prod/cen2010/doc/sf1.pdf#page=504.

[83] Caution is needed in interpreting the "Other Noninstitutional" population to represent the actual homeless population of Montana, as this count likely under-represents the actual number of persons experiencing homelessness in the state. A more recent local count of this population is covered in a latter section of this document.

facilities. By contrast, the institutionalized population fell by 1.2 percent, despite a 29.4 percent rise in those interned in correctional facilities.

Map H.7

2000 Population with Disabilities

Non-Entitlement Areas of Montana

Census Bureau 2000

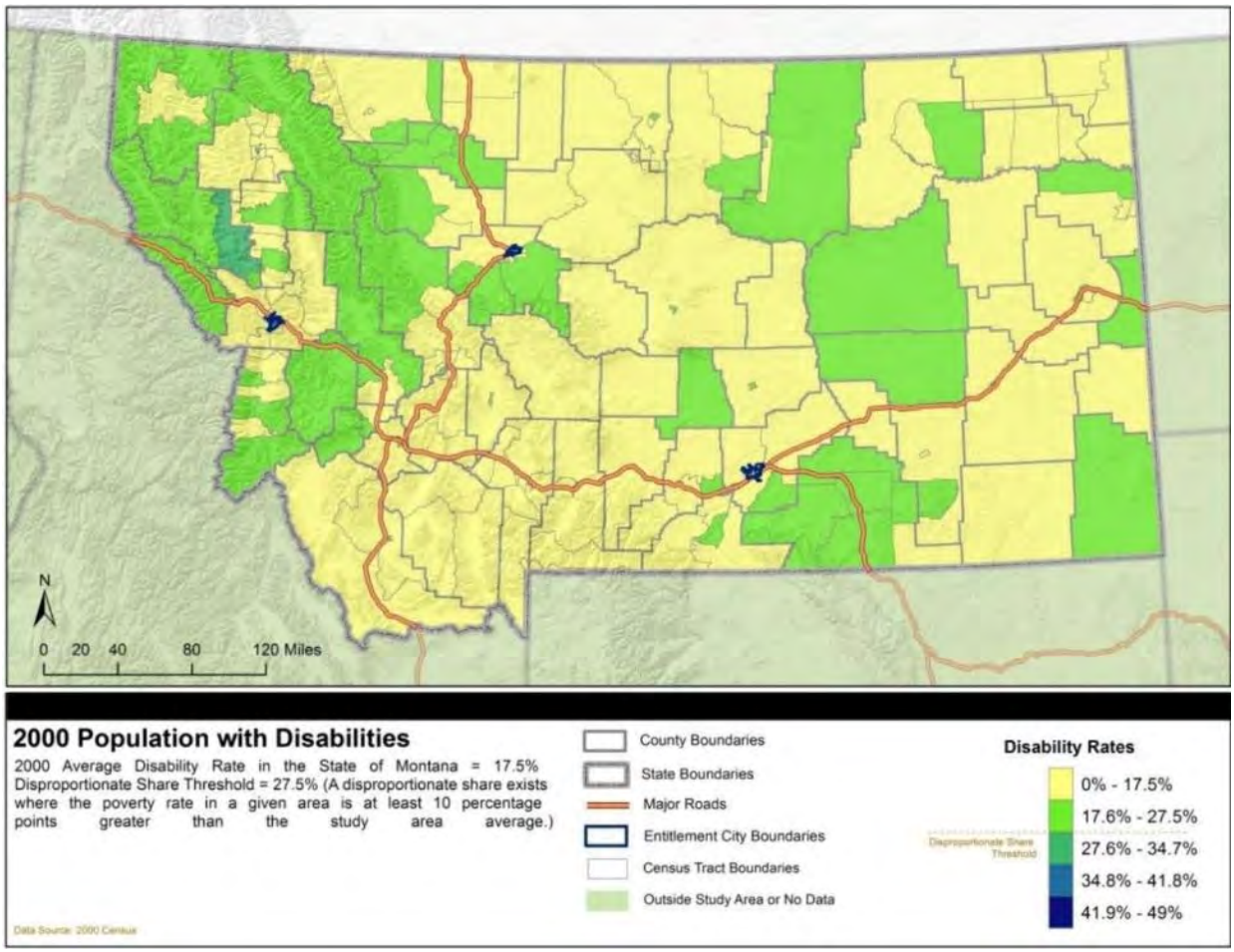


Table H.8
Group Quarters Population
State of Montana
2000 & 2010 Census SF1 Data

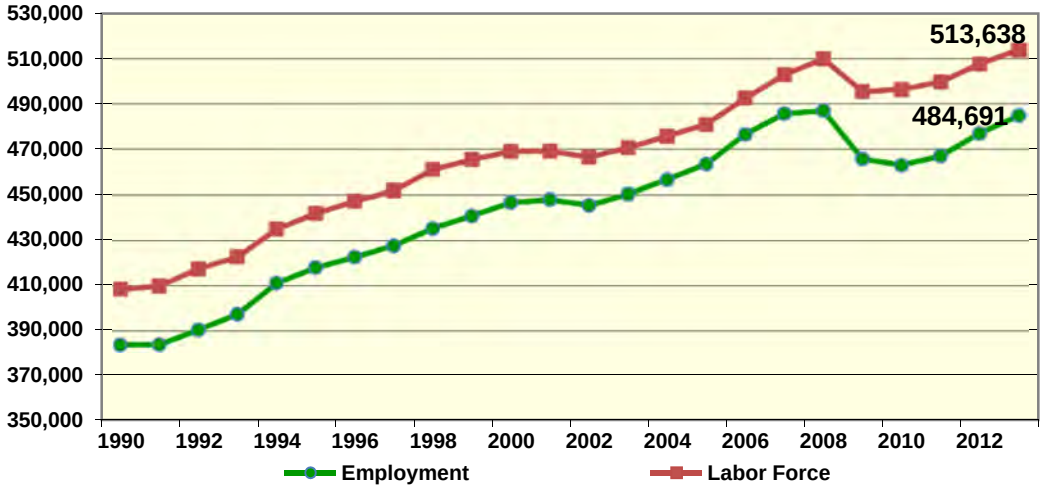
Group Quarters Type	2000 Census		2010 Census		% Change
	Population	% of Total	Population	% of Total	00–10
Institutionalized					
Correctional Institutions	4,124	34.2%	5,338	44.7%	29.4%
Juvenile Facilities	.	.	1,020	8.6%	.
Nursing Homes	6,470	53.6%	5,200	43.6%	-19.6%
Other Institutions	1,474	12.2%	371	3.1%	-74.8%
Total	12,068	100.0%	**11,929**	100.0%	-1.2%
Non-institutionalized					
College Dormitories	7,035	55.4%	8,332	49.2%	18.4%
Military Quarters	404	3.2%	678	4.0%	67.8%
Other Noninstitutional	5,255	41.4%	7,910	46.7%	50.5%
Total	**12,694**	**51.3%**	**16,920**	**58.7%**	**33.3%**
Group Quarters Population	**24,762**	**100.0%**	**28,849**	**100.0%**	**16.5%**

D. Economic Conditions

Labor Force and Employment

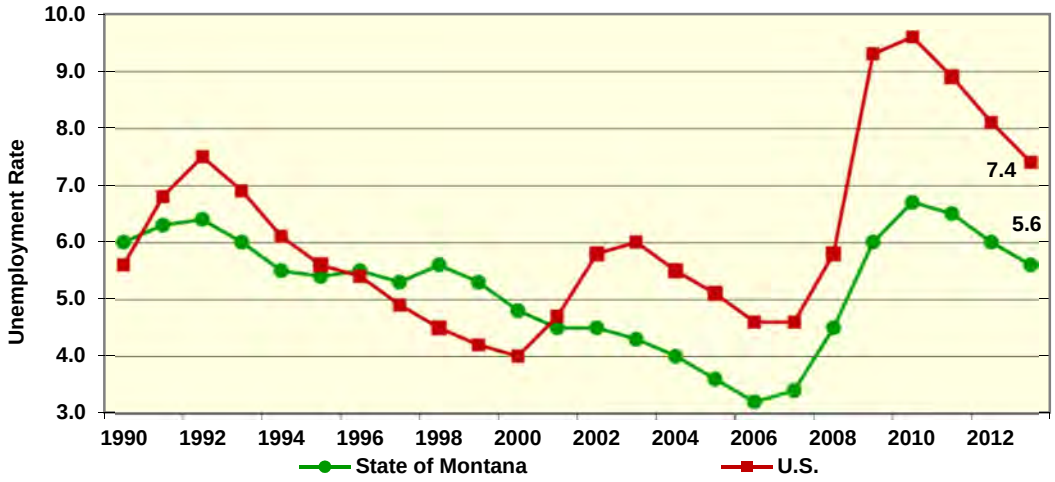
The size of the labor force, which represents the number of residents either working or looking for work, and the number of workers employed in Montana have both grown considerably for more than two decades, though the recent worldwide recession did leave its mark on the Montanan labor market. As seen in Figure H.1 the state saw a sharp decline in employment, starting in 2008. Numbers have begun to rise in the past few years, reaching 484,691 in employment. The labor force contained 513,638; this gap represents the number of persons in Montana that are unemployed. This gap widened with the recession, but has narrowed slightly in more recent years.

Figure H.1
Unemployment Rate
State of Montana
1990–2012 BLS Data



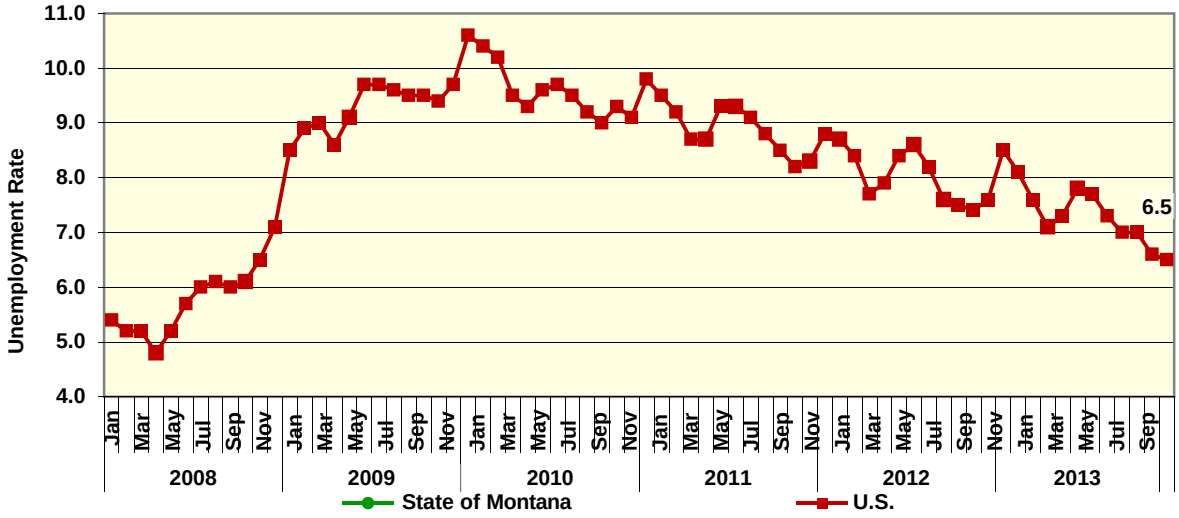
Prior to 2007, unemployment in Montana had been on a generally downward trend for nearly two decades thanks to the steady growth in the number of employed persons, which slightly but consistently outpaced the rate at which new members were added to the labor force. However, a large growth in unemployment came after 2007, when the unemployment rate jumped and continues to rise until 2010. Since 2010, the unemployment rate in the state has been falling steadily, reaching 5.6 percent. Looking at this rate compared to the national unemployment rate, Montana has had a lower rate than the national average since 2002 and not hit as hard by the recent recession, as shown in Figure H.2.

Figure H.2
Unemployment Rate
State of Montana
1990–2012 BLS Data



The figure below, shows the state unemployment rate since 2008. The state saw its highest unemployment rate at the beginning of 2010 and it has been declining since that time, reaching 6.5 percent at the end of 2013.

Figure H.3
Montana Unemployment Rate
State of Montana
BLS Data



Full and Part-Time Employment

The Bureau of Economic Analysis (BEA) provides an alternate index of employment; a count of full-time and part-time jobs in the state. These data differ from the BLS data discussed previously in that they are collected where workers are employed rather than at the household level, and the same person may be counted twice in this dataset if he or she works more than one job.

The count of jobs in the state and the count of labor force participants both yield a similar portrait; of steady growth in the labor market until 2008. In fact, the BEA data indicate that this growth has been steady since 1969, and that growth in the number of jobs was uniformly positive for nearly four decades. In 1969, there were around 300,000 jobs in the state. By 2008, that number had grown close to 650,000. However, with the onset of the recession of the late 2000s the number of jobs in the state began to fall, and by 2010 the state had lost over 20,000 jobs. Since 2010, the number of jobs in the state has slowly begun to recover (Figure H.4). Though growth in total employment has yet to match pre-recession levels, these recent data 2011 and 2012 are encouraging.

Figure H.4
Full- and Part-Time Employment
State of Montana
1969–2012 BEA Data

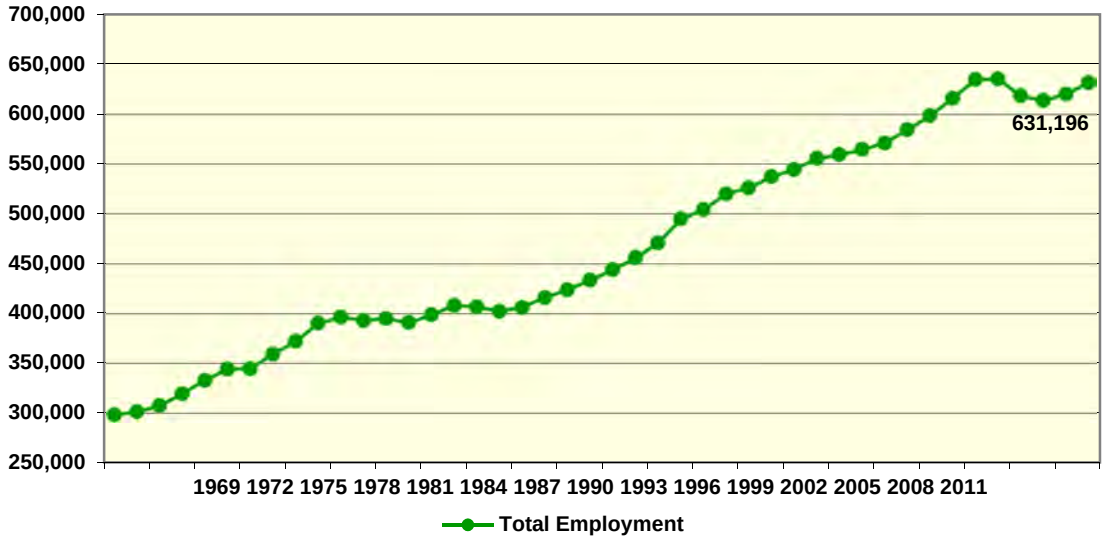
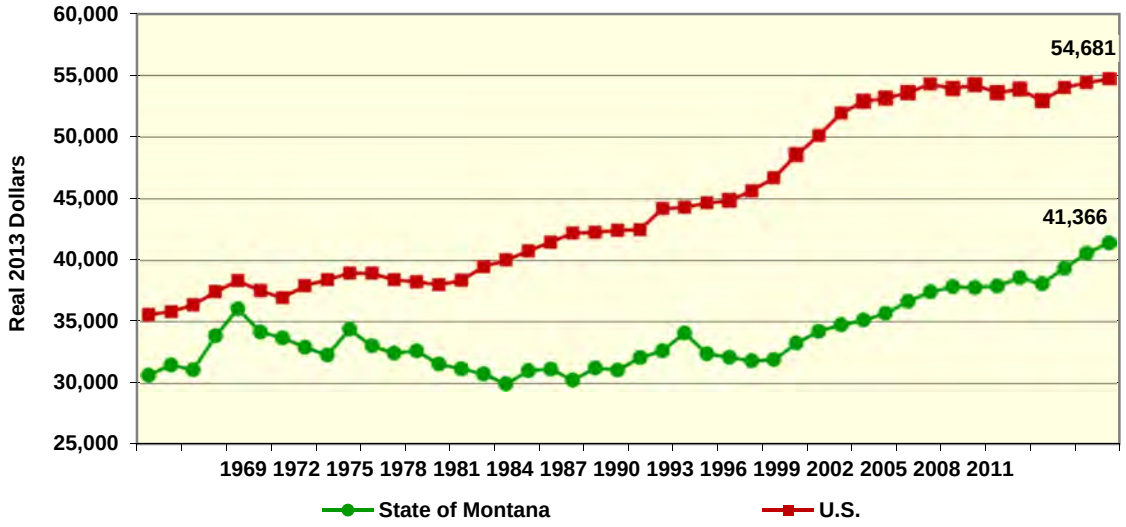
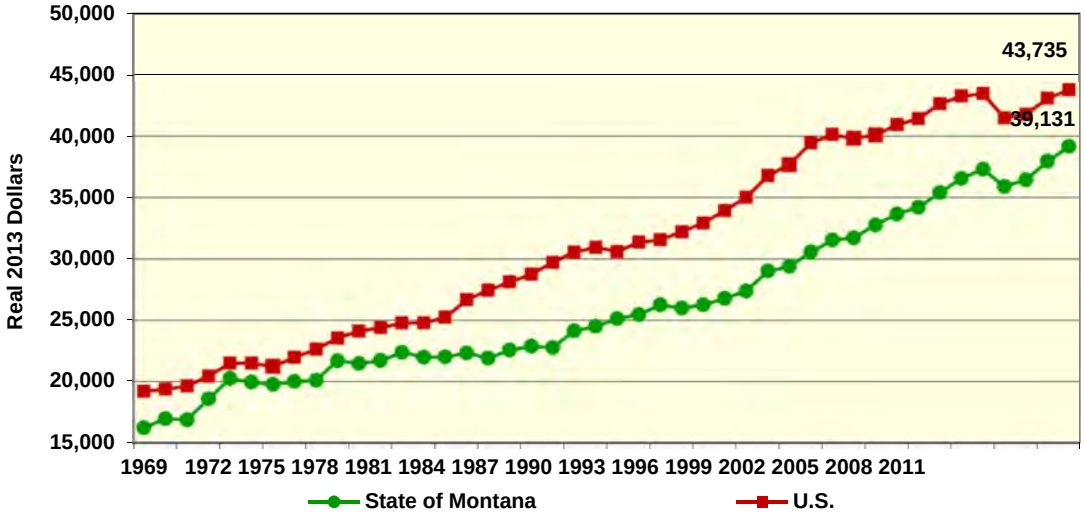


Figure H.5
Real Average Earnings Per Job
State of Montana 1969–
2012 BEA Data, 2012 Dollars



Growth in real per capita income (PCI), which is defined as the total personal income from all sources divided by the number of residents in the state, was smoother than growth in wages during the period from 1969 to 2012. The gap between Montana and the nation has widened slightly since the 1980's, but has begun to decrease slightly since the recession. Real PCI fell in the state of Montana after 2008, consistent with the nation. However, it began to climb and is now higher than it was prior to the recession. This is shown in Figure H.6.

Figure H.6
Real Per Capita Income
State of Montana 1969–
2012 BEA Data, 2012 Dollars



Poverty

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for that size family, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts monetary income earned before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid and food stamps. Poverty is not defined for people in military barracks, institutional group quarters or for unrelated individuals under the age of 15, such as foster children. These people are excluded from the poverty calculations, as they are considered as neither poor nor non-poor.[84]

In Montana the poverty rate in 2000 was 14.6 percent, with 128,355 persons living in poverty. The state had over 14,000 children under the age of 5 living in poverty in 2000, and another 28,554 children between the ages of 6 and 18 living in poverty. By 2012, there were 17,030 children under 6 living in poverty, and 26,429 children aged 6 to 17. Additionally, in 2012, there were 12,026 of the state's citizens 65 years of age or older were also considered to be living in poverty. Much of the growth of the poverty rate is attributed to an increase in persons aged 18 to 64 that were living in poverty, accounting for 61.2 percent of those living in poverty in 2012.

[84]http://www.census.gov/hhes/poverty/povdef.html.

Table H.9

Poverty by Age

State of Montana

2000 Census SF3 & 2012 Five-Year ACS Data

Age	2000 Census		2012 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	14,358	11.2%	17,030	11.9%
6 to 17	28,554	22.2%	26,429	18.5%
18 to 64	75,074	58.5%	87,634	61.2%
65 or Older	10,369	8.1%	12,026	8.4%
Total	**128,355**	**100.0%**	**143,119**	**100.0%**
Poverty Rate	**14.6%**		**14.8%**	**.**

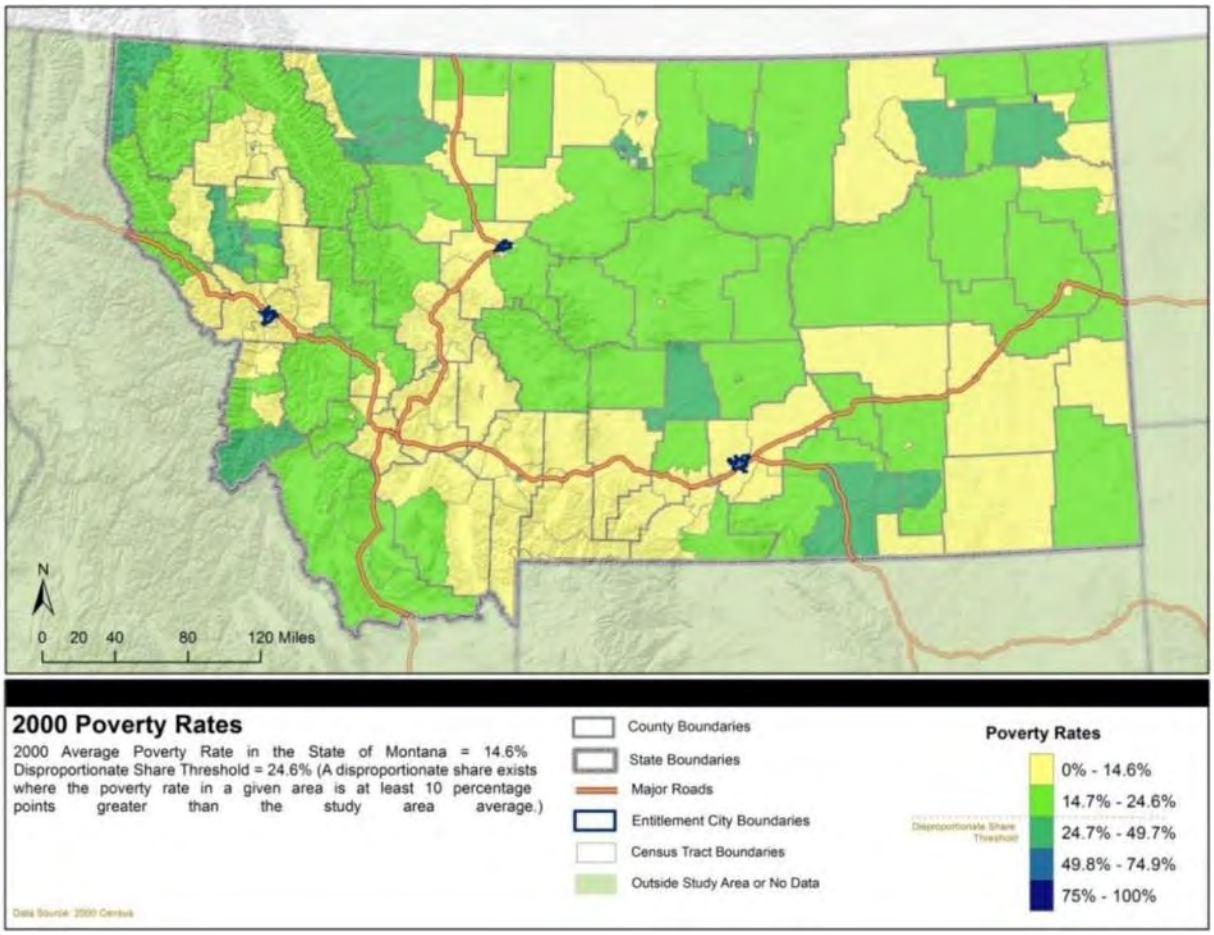
Maps in this appendix show the shifts in area with concentrations of poverty throughout the state. The state has seen some areas with higher concentrations of poverty in 2012 than it did in 2000. The eastern portion of the state also saw a decline in some areas in the percentage of people living in poverty. The maps also demonstrates areas with disproportionate share of poverty, or a difference of greater than 10 percentage points from the average poverty rate for the state.

Map H.8

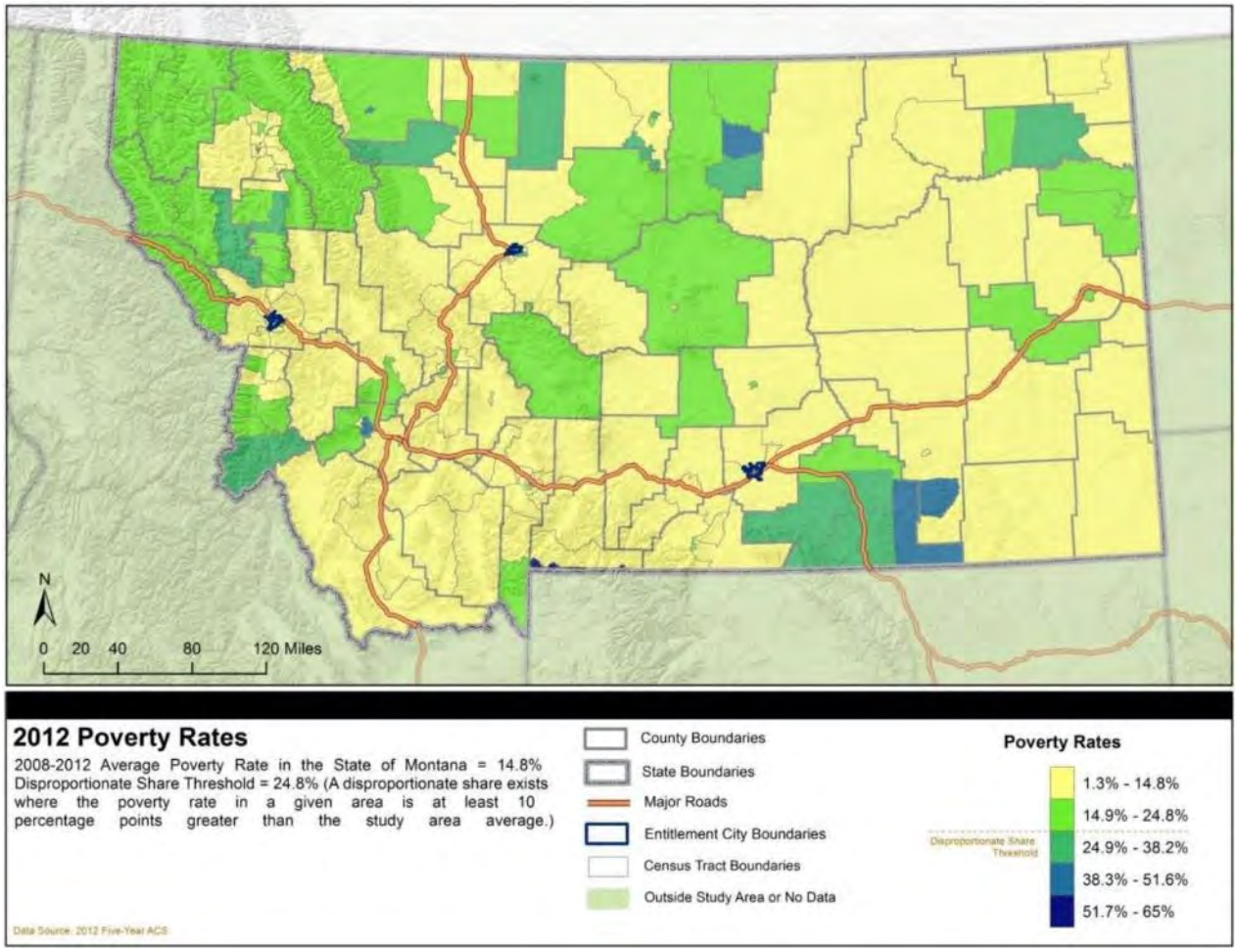
2000 Poverty Rates

State of Montana

2000 Census Data



Map H.9
2012 Poverty Rates
State of Montana
American Community Survey, 2008-2012



More recent poverty data for Montana, extracted from the Census Bureau's Small Area Income and Poverty Estimates (SAIPE) program. Having held steady between 13.3 and 14.6 percent for most of the decade, the poverty rate increased to 15.0 in 2009 and rose slightly each following year. As of 2012 the poverty rate was at 15.6, close to the national poverty rate of 15.9 for the same year.

Despite the level of poverty in Montana, HUD's estimate of the median family income increased from 2000 through 2013. During this thirteen year period, the median family income increased from $39,900 to $58,500. The biggest growth was seen between 2003 and 2004, with an 8.4 percent increase. Since 2010, growth has slowed, with only 5.4 percent increase in median family income between 2010 and 2014.

E. Summary

Between 1980 and 2013, the population in Montana increased by over 110,000 people, starting at 902,195 in 1980 to over 1 million by 2013. Over the course of these thirteen years, total population growth equaled 12.5 percent.

In 2010, the vast majority of the population, 89.4 percent, was white, although this group did not keep pace with the average growth rate for the state. The second largest racial group in 2010 was American Indians at 6.3 percent, followed by persons of two or more races, Asian, "other," black, and Native Hawaiian/Pacific Islander. As for ethnicity, persons of Hispanic descent comprised 2.9 percent of the population. Geographic analysis of racial and ethnic data showed that while certain areas throughout the state may have higher concentrations of racial or ethnic minorities, there were no areas with a disproportionate share. The exception to this is American Indians, who were largely concentrated in or around Tribal reservations. The two fastest growing age groups in Montana were those aged 55 to 64 and those aged 65 and older, indicating an aging population. 17.5 percent of the population aged 5 or older in Montana had one or more disabilities at the time of the 2000 census. In terms of population growth, the state is expected to grow to over 450,000 households by 2020 and to over 510,000 by 2040.

Table H .10
Poverty Rate
State of Montana
Census Bureau SAIPE Poverty Estimates, 2000 - 2012

Year	Individuals in Poverty	Poverty Rate
2000	117,677	13.3
2001	124,776	14.0
2002	126,154	14.0
2003	129,109	14.2
2004	125,081	13.6
2005	132,226	14.6
2006	132,537	14.4
2007	131,433	14.1
2008	132,971	14.1
2009	142,257	15.0
2010	146,257	15.2
2011	148,183	15.2
2012	153,105	15.6

From 1990 through 2013, the labor force in Montana, defined as people either working or looking for work, rose from about 410,000 persons to 513,638 persons. While during the mid-1990s Montana's unemployment rate remained fairly steady with the national rate, Montana's unemployment rate has remained below the national rate since 2002. In 2012 the statewide unemployment rate was at 5.6 percent, after having fallen from over 10 percent in 2010. In 2013, the real average earning per job in Montana was $54,681, and real per capita income was $39,131, but both of these figures were below national averages. In Montana the poverty rate in 2012 was 15.6 percent with 153,105 persons living in poverty; this rate was comparable to the national average of 15.9 percent at that time. The poverty rate in the state has risen since 2000 when it was 13.3 percent. Persons in poverty were concentrated in select census tracts across the state.

Appendix I: Application for Federal Assistance (SF-424)

This section will not be updated

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission: ☐ Preapplication ☒ Application ☐ Changed/Corrected Application	* 2. Type of Application: ☒ New ☐ Continuation ☐ Revision	* If Revision, select appropriate letter(s): * Other (Specify):

* 3. Date Received: 04/09/2015	4. Applicant Identifier:
5a. Federal Entity Identifier:	5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:	State of Montana
* b. Employer/Taxpayer Identification Number (EIN/TIN): 81-0302402	* c. Organizational DUNS: 8097905790000

d. Address:

* Street1:	PO Box 202925
Street2:	Montana Department of Public Health & Human Services
* City:	Helena
County/Parish:	Lewis & Clark
* State:	MT: Montana
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	59620-2925

e. Organizational Unit:

Department Name: Public Health & Human Services	Division Name: Human & Community Services

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	Ms.	* First Name:	1)Marcia; 2) Kane
Middle Name:			
* Last Name:	1)Lemon; 2)Quenemoen		
Suffix:			

Title: 1) Program Manager; 2) Bureau Chief

Organizational Affiliation:
DPHHS - Human & Community Services Division

* Telephone Number:	406-447-4267	Fax Number:	406-444-2547

* Email: 1) mlemon@mt.gov 2 kquenemoen@mt.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-231

CFDA Title:

ESG and HOPWA

*** 12. Funding Opportunity Number:**

309999

* Title:

HUD Montana Nonentitlement for ESG and HOPWA

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

State of Montana ESG and HOPWA

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: MT
* b. Program/Project: MT

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 04/01/2015
* b. End Date: 03/31/2016

18. Estimated Funding ($):

* a. Federal	684,772.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	684,772.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on
- [x] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [ ] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Ms. | * First Name: Jamie

Middle Name:

* Last Name: Palagi

Suffix:

* Title: Administrator: Montana DPHHS HCSD

* Telephone Number: 406-444-6676 | Fax Number: 406-444-2547

* Email: jpalagi@mt.gov

* Signature of Authorized Representative: Jamie Palagi | * Date Signed: 4.7.15

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-228

CFDA Title:

Community Development Block Grant Program

*** 12. Funding Opportunity Number:**

309999

* Title:

HUD - Montana Nonentitlement for Community Development Block Grant Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

State of Montana Community Development Block Grant Program

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: MT
* b. Program/Project: MT

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 04/01/2015
* b. End Date: 03/31/2016

18. Estimated Funding ($):

* a. Federal	5,682,163.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	5,682,163.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on
- [x] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [ ] c. Program is not covered by E.O. 12372.

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- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Ms.
* First Name: Meg
Middle Name:
* Last Name: O'Leary
Suffix:

* Title: Director: Montana Department of Commerce
* Telephone Number: 406-842-2770
Fax Number: 406-841-2771
* Email: DocCDD@mt.gov
* Signature of Authorized Representative: Meg O'Leary
* Date Signed: 4/9/15

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☒ New	
☒ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:
04/09/2015	

5a. Federal Entity Identifier:	5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: State of Montana

* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:
81-0302402	8097905790000

d. Address:

* Street1:	301 South Park Avenue
Street2:	Montana Department of Commerce - PO Box 200523
* City:	Helena
County/Parish:	Lewis & Clark
* State:	MT: Montana
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	59620-0523

e. Organizational Unit:

Department Name:	Division Name:
Montana Department of Commerce	Community Development Division

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	Ms.	* First Name:	1) Kelly; 2) Jennifer
Middle Name:			
* Last Name:	1) Lynch; 2) Olson		
Suffix:			

Title: 1) Division Administrator; 2) Bureau Chief

Organizational Affiliation:
Department of Commerce Community Development Division

* Telephone Number:	406-841-2770	Fax Number:	406-841-2771

* Email: 1) klynch@mt.gov 2) jeolson@mt.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-239

CFDA Title:

Home Investment Partnerships Program

*** 12. Funding Opportunity Number:**

309999

* Title:

HUD Montana Nonentitlement for HOME Investment Partnerships Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

State of Montana Home Investments Partnerships Program

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: MT
* b. Program/Project: MT

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 04/01/2015
* b. End Date: 03/31/2016

18. Estimated Funding ($):

* a. Federal	3,002,167.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	3,002,167.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on
- [x] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [ ] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Ms.
* First Name: Meg
Middle Name:
* Last Name: O'Leary
Suffix:

* Title: Director: Montana Department of Commerce

* Telephone Number: 406-842-2770
Fax Number: 406-841-2771

* Email: DocCDD@mt.gov

* Signature of Authorized Representative: Meg O'Leary
* Date Signed: 4/9/15

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☒ New	
☒ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:
04/09/2015	

5a. Federal Entity Identifier:	5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: State of Montana

* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. Organizational DUNS:
81-0302402	8097905790000

d. Address:

* Street1:	301 South Park Avenue
Street2:	Montana Department of Commerce - PO Box 200523
* City:	Helena
County/Parish:	Lewis & Clark
* State:	MT: Montana
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	59620-0523

e. Organizational Unit:

Department Name:	Division Name:
Montana Department of Commerce	Community Development Division

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	Ms.	* First Name:	1)Kelly; 2) Jennifer
Middle Name:			
* Last Name:	1)Lynch; 2)Olson		
Suffix:			

Title: 1) Division Administrator; 2) Bureau Chief

Organizational Affiliation:
Department of Commerce Community Development Division

* Telephone Number:	406-841-2770	Fax Number:	406-841-2771

* Email: 1) klynch@mt.gov 2)jeolson@mt.gov

Appendix J: State and Program Certifications

This section will be updated to include the correct CDBG National Objectives at the conclusion of the public comment period on the Amendment to the Consolidated Plan and Annual Action Plan Amendments. All other state certifications remain in effect.

STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying -- To the best of the State's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts

under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

Date 4/9/15

DIRECTOR
Title

STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying -- To the best of the State's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts

under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

4-7-15
Date

Administrator
Title

Specific CDBG Certifications

The State certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is or will be following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

Consultation with Local Governments -- It has or will comply with the following:

1. It has consulted with affected units of local government in the nonentitlement area of the State in determining the method of distribution of funding;

2. It engages in or will engage in planning for community development activities;

3. It provides or will provide technical assistance to units of local government in connection with community development programs; and

4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

Local Needs Identification -- It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objectives of Title I of the Housing and Community Development Act of 1974, as amended. (See 24 CFR 570.2 and 24 CFR part 570)

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);

2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 199 , , and . (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

3. Special Assessments. The state will require units of general local government that receive CDBG funds to certify to the following:

It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Compliance with Laws -- It will comply with applicable laws.

Signature/Authorized Official

Date 4/9/15

DIRECTOR
Title

Specific HOME Certifications

The State certifies that:

Tenant Based Rental Assistance -- If it intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the State's consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Appropriate Financial Assistance -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature/Authorized Official

Date 4/9/15

DIRECTOR

Title

ESG Certifications

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

Matching Funds – The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).

Discharge Policy – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Confidentiality – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

Major rehabilitation/conversion – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Homeless Persons Involvement – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

Consolidated Plan – All activities the subrecipient undertakes with assistance under ESG are consistent with the State's current HUD-approved consolidated plan.

Signature/Authorized Official

4-7-15
Date

Administrator
Title

HOPWA Certifications

The State HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under the program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,

2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature/Authorized Official

4-7-15
Date

Administrator
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.