Governor Steve Bullock

State of Montana

Annual Action Plan

April 1, 2019 through March 31, 2020

MONTANA
DEPARTMENT OF COMMERCE

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DRAFT
Public Comment Period
July 10, 2019 through
August 9, 2019

EQUAL HOUSING OPPORTUNITY

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Annual Action Plan

Process

AP-05 Executive Summary

Introduction

The State of Montana's *2019–2020 Annual Action Plan* serves as the application to the U.S. Department of Housing and Urban Development (HUD) for funding of the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) Program, Emergency Solutions Grant (ESG) Program, and National Housing Trust Fund (HTF) for Plan Year Five of the 2015-2020 Montana Consolidated Plan for Housing and Community Development (*2015-2020 Consolidated Plan*). The *2019–2020 Annual Action Plan* and *2015–2020 Consolidated Plan* comprehensively fulfill three basic goals in Montana: provide decent housing, provide a suitable living environment, and expand economic opportunities.

The Annual Action Plan describes to HUD any changes or trends in Montana's housing, homeless populations, special needs populations, community development, and economic development needs during the period since the submission of the 2015-2020 Consolidated Plan. The *2019–2020 Annual Action Plan* also summarizes the actions Montana will take to support the strategic goals identified in the Consolidated Plan during Plan Year Five, from April 1, 2019, through March 31, 2020.

Summarize the objectives and outcomes identified in the Plan

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

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 the homeless, disabled, elderly, and other disadvantaged populations;
e. Encourage the development and rehabilitation of community facilities and services located within walkable neighborhoods and/or served by public transportation systems, particularly for the homeless, disabled, elderly, and other disadvantaged populations.

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 with safe, efficient public infrastructure, particularly for the homeless, disabled, elderly, and other disadvantaged populations.

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 leverage 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 for the homeless, disabled, elderly, and other disadvantaged populations.

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

Evaluation of past performance

The Montana Departments of Commerce (Commerce) and Public Health and Human Services (DPHHS) have received annual funding for the CDBG, HOME, and ESG programs for over 30 years. Activities have been completed with reduced administrative and activity budgets while adhering to increased regulatory requirements. Programs are oversubscribed, and funding is insufficient to meet the needs across the state. 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 (AMI). Therefore, any further decreases in funding would be devastating to communities who use these sources to fill critical financial gaps in project activities. As demonstrated in 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 2015-2020. These documents specify measurable goals, state the objectives and outcomes identified in each year's Annual Action Plan, and include an evaluation of past performance. These documents can be found on Commerce's website.

Summary of Citizen Participation Process and consultation process

This process provides citizens an opportunity to provide input in the development of the Annual Action Plan and to evaluate and comment on ways to improve the efficacy of programs. Montana follows the standards set forth in the Citizen Participation Plan (Appendix A of the *2015–2020 Consolidated Plan*) during development and adoption of its *2019–2020 Annual Action Plan* documents.

The public comment period for the Draft *2019–2020 Annual Action Plan* was advertised on July 9, 2019, began July 10, 2019 and will end August 9, 2019. A public hearing will be held on August 2, 2019, at 10:30 a.m. in conference room 228 at 301 South Park Ave Helena, MT. 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 provided in Attachment B of the final document. See: http://commerce.mt.gov/conplan.

Summary of public comments

Once the public comment period has ended, Commerce will provide a summary of the public comments received, which will be found in Attachment B in the final version of this document.

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

Once the public comment period has ended, Commerce will provide a summary of the public comments or views not accepted during the development of the *2019-2020 Annual Action Plan*, which will be found in Attachment B in the final version of this document.

Summary

A summary of the public process, comments received, and responses will be included in Attachment B of the final draft of this document after the closure of the public comment period.

PR-05 Lead & Responsible Agencies

Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing and administering the 2015-2020 Consolidated Plan, this *2019–2020 Annual Action Plan*, and each grant program and funding source.

Table 1 – Responsible Agencies

Agency Role	Name	Department/Agency
Lead Agency	Tara Rice, Director	Montana Department of Commerce
CDBG Administrator	Jennifer H. Olson, Division Administrator	
HTF Administrator		
HOME Administrator		
HOPWA Administrator	Jamie Palagi, Division Administrator	Montana Department of Public Health & Human Services
ESG Administrator		

Narrative

Commerce is the lead agency overseeing the administration of the *2015–2020 Consolidated Plan* and the preparation of the *2019–2020 Annual Action Plan*. Commerce administers CDBG, HOME, and HTF programs covered by this *2019–2020 Annual Action Plan*. DPHHS administers the ESG Program and Montana's Housing Opportunities for Persons with AIDS (HOPWA) Program cooperative partnership with North and South Dakota. The state's HOPWA program is funded through a competitive grant process, not the Consolidated Plan.

Consolidated Plan Public Contact Information

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

Introduction

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

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

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

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

Commerce facilitates and promotes a broad-based team approach to address affordable housing issues through the Housing Coordinating Team (HCT). The HCT aids 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 Inc., Montana Independent Living Project, Montana Building Industry Association, non-profit housing providers, and local housing authorities from across the state.

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 non-profits, faith-based organizations, and local and state governments. The Coalition was established for the purpose of carrying out the duties of the national MTCoC Program, as provided for in federal statute 24 CFR Part 578. The MTCoC system is predicated upon community and regionally based continuum of care systems, which form the statewide coalition and continuum of care process. Commerce and DPHHS are involved in MTCoC meetings and committees. The MTCoC coordinator participated in the development, preparation, and review of the *2015–2020 Consolidated Plan.*

Funds for transitional housing, permanent supportive housing, and rapid rehousing across Montana are available on a competitive basis through the state's MTCoC process. Twelve regional MTCoC districts, housed within the state's ten Human Resource Development Councils (HRDCs), serve the entire state of Montana with homeless assistance funds. Each of these regional MTCoC districts provides specific services of crisis stabilization and housing supports for veterans, unaccompanied youth, families with children, and chronically homeless individuals and families. All of Montana's regional MTCoC districts were invited to participate in the development, preparation, and review of the *2015–2020 Consolidated Plan* and serve as repositories for public review of the Draft *2019–2020 Annual Action Plan*.

The MTCoC has developed the Montana Coordinated Assessment System (CAS) in seven of the ten Montana districts. In conjunction, it has transitioned to a new State Homeless Management Information System (HMIS) with Pathways-MISI which includes elements so that the CAS can be managed within the new HMIS. DPHHS has been involved with both planning processes.

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

DPHHS has an invested and integral role with the MTCoC. They coordinate strategy with ESG, participate in regular MTCoC monthly meetings and CoC Rapid Rehousing meetings, and collaborate at the annual ESG Roundtable including discussions on performance standards and HMIS data integrity.

The MTCoC transitioned to a new HMIS system with Pathways MISI, so DPHHS is no longer the leading agent for the system nor the administrator. However, DPHHS was involved with the transition process by providing input and participating in committees on system elements and coordinated entry components. It will continue to be involved with the system's development as a member of the MTCoC and ESG and HOPWA HUD grantee.

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

Table 2 – Agencies, Groups, Organizations Who Participated

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

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

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

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

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

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

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

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

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

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

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

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
75	District VI Human Resource Development Council	Regional organization ; Services – Elderly Persons; Services – Children	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv; participated as public repository
76	Montana Community Development Corporation	Regional organization	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	Participated as public repository
77	Montana Fair Housing	Regional organization	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Participated as public repository
78	Montana Human Rights Bureau	State	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Participated as public repository
79	Montana State Library	State	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Participated as public repository
80	Opportunities, Inc.	Regional organization	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Participated as public repository
81	Rocky Mountain Development Council	Regional organization	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Participated as public repository

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
82	District VII HRDC in Billings	Regional organization ; Services – Elderly Persons; Services – Children	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv
83	District XII HRDC in Butte	Regional organization ; Services – Elderly Persons; Services – Children	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv
84	Anaconda Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
85	Billings Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
86	Blackfeet Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
87	Chippewa-Cree Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
88	Dawson County Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
89	Fort Belknap Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
90	Fort Peck Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
91	Glasgow Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
92	Helena Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
93	Poplar (City of) Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
94	Richland Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv

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

#	Agency/Group/ Organization	Type(s)	What section of the Plan was addressed by Consultation?	Action*
104	GL Development	Private Industry	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	Included on email listserv; attended public meeting; provided comment
105	NeighborWorks Great Falls	Non-profit	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv; participated as public repository; attended public meeting; provided comment
106	Cascade County	County	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 meeting; provided comment

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

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

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan
Main Street Montana Project	Governor of the State of Montana	The *2015–2020 Consolidated Plan*, the *2018–2019 Annual Action Plan*, and the Governor's business plan for the state of Montana share the same primary goals to provide decent housing, a suitable living environment, and expand economic opportunities in Montana. These 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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan
		local infrastructure strategies for sustainable growth and development; and assisting local efforts to revitalize historic downtown business districts. Both plans seek to strengthen and promote Montana to recruit businesses and workers by creating a statewide business and employee recruitment and retention strategy focused on Montana's quality of life; preserving Montana's outdoor recreation opportunities and environment; and strengthening public safety and infrastructure across Montana.
State Continuum of Care	DPHHS	The MTCoC provides funding for many of the same activities provided through the HUD-funded programs addressed in the *2015-2020 Consolidated Plan* and *2018–2019 Annual Action Plan* for homeless individuals and families.
2015-2019 Consolidated Plan	City of Billings	The State and the City of Billings continue to share the same primary goals to provide decent housing, a suitable living environment, and expand economic opportunities through the preservation of the existing affordable housing stock, creating new affordable housing opportunities, and expanding housing choice options for existing and potential residents to foster stable, socio-economically diverse neighborhoods.
2014-2018 Consolidated Plan	City of Missoula	The State and the City of Missoula share the same primary goals to provide decent housing, a suitable living environment, and expand economic opportunities through ending homelessness, increasing affordable rental housing and homeownership opportunities, providing public facilities and infrastructure, achieving economic development, encouraging sustainability and decreasing or mitigating environmental hazards in housing and neighborhoods, eliminating barriers to affordable housing, planning to meet future community development needs, and expanding capacity to support community service needs.
2016-2020 Consolidated 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.

AP-12 Participation – 91.115, 91.300(c)

Summarize citizen participation process and how it impacted goal-setting

Commerce developed a list of over 1,300 contacts consisting of members of the public; 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. The stakeholders are notified of all aspects of the development of the Annual Action Plan, including invitations to attend public hearings and the notice of availability of draft documents for review and comment. A webinar and teleconference capabilities are provided during all meetings and hearings, and all meeting materials, minutes, and transcripts are available via the Commerce website. Comments will be considered, and responses will be provided in Attachment B of the final version of this document.

The public comment period for the *Draft 2019–2020 Annual Action Plan* was advertised on July 9, 2019, began July 10, 2019 through August 9, 2019. Individuals and interested organizations were encouraged to provide public input for the development of this document. A public hearing was held August 2, 2019, at 10:30 a.m. in conference room 228 at 301 South Park Ave Helena, MT. Public comments and views submitted during the public hearing and comment period will be used in determining the goals and priorities of the Annual Action Plan documents.

Full details of the citizen participation process are available on the Commerce website. Commerce publishes an official transcript of the public hearing on its Consolidated Plan website to enhance public participation and access to information regarding the development of these documents. Commerce announced and published 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 various repositories across the state.

Table 4 – Citizen Participation Outreach

Sort	Mode of Outreach	Target of Outreach
1	Other – Email listserv	All interested citizens
	Summary of response/attendance	Commerce announced the availability of the *Draft 2019–2020 Annual Action Plan* by emailing notice to the Consolidated Plan contact list.
	Summary of Comments Received	See Attachment B for a summary of comments received in the final published document.
	Summary of comments not accepted and reasons	Information will be included in the final published document at the conclusion of the public comment process.
2	Public Hearing	All interested citizens
	Summary of response/attendance	A public hearing is scheduled to be held during the Public Comment Period.
	Summary of Comments Received	See Attachment B for a summary of comments received in the final published document.

Sort	Mode of Outreach	Target of Outreach
	Summary of comments not accepted and reasons	Information will be included in the final published document at the conclusion of the public comment process.
3	Newspaper Ad	All interested citizens
	Summary of response/attendance	Commerce announced and published the *Draft 2019–2020 Annual Action Plan* by publishing advertisements in newspapers across Montana.
	Summary of Comments Received	See Attachment B for a summary of comments received in the final published document.
	Summary of comments not accepted and reasons	Information will be included in the final published document at the conclusion of the public comment process.
4	Other – Public Repositories	All interested citizens
	Summary of response/attendance	Commerce provides copies of the *Draft 2019–2020 Annual Action Plan* at over 20 publicly accessible locations across Montana.
	Summary of Comments Received	See Attachment B for a summary of comments received in the final published document.
	Summary of comments not accepted and reasons	Information will be included in the final published document at the conclusion of the public comment process.
5	Internet Outreach	All interested citizens
	Summary of response/attendance	Commerce announced and posted the *Draft 2019–2020 Annual Action Plan* on the website for public review.
	Summary of Comments Received	See Attachment B for a summary of comments received in the final published document.
	Summary of comments not accepted and reasons	Information will be included in the final published document at the conclusion of the public comment process.

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

Introduction

This section describes the resources expected to be allocated by program type throughout the state of Montana during Plan Year Five (April 1, 2019 – March 31, 2020). The total amount expected for the remaining year of the Consolidated Plan considers a five percent (5%) decrease in funding per year.

CDBG administration allocations are capped at 20% of the annual CDBG allocation in addition to eligible program income received during the program year. The amount of federal CDBG administrative funds will not exceed $1,271,208. The use of administrative funds will not exceed 3% plus $100,000 for state CDBG staff with the balance of administrative costs for planning and grantee administrative costs to support the completion of project activities. Any administrative funds not awarded to grantees for planning or grantee administrative costs will be redirected to project costs for completing activities.

HOME administration allocations are capped at 10% of the annual allocation in addition to eligible program income received during the program year following the required affordability period. The amount of federal HOME administrative funds will not exceed $300,573. Revenue received during a project's affordability period is considered recaptured and will not be used for administration.

HTF administration allocations are capped at 10% of the annual allocation. The amount of federal HTF administrative funds will not exceed $300,000. The use of administrative funds will not exceed 10% for state HTF staff and grantee administrative costs to support the completion of project activities. Any administrative funds not awarded to grantee for grantee administrative costs will be redirected to project costs for completing activities. The state will distribute funds as part of an application process through recipients, to carryout grantee activities.

Expected revenues for the CDBG program include repayments for funding loaned to businesses that create job opportunities for Montanans of low- to moderate- income. Expected revenues for the HOME program include recaptured and program income funding generated by the First-Time Homebuyer Loan program. The State of Montana is unable to predict the amount of program income that will be received in any given plan year because the amount that will be earned is future revenue not yet receipted.

To achieve the most effective and efficient use of CDBG funds, the Director of the Department of Commerce may reallocate up to 15% of the total CDBG allocation among Public Facility, Housing and Neighborhood Renewal, or Economic Development grant categories, depending upon the needs in the State during the Plan Year. Reallocations may also be made of any remaining balances within a grant category within the last three months of a 15-month obligation deadline to meet the HUD Timely Distribution requirement.

To achieve the most effective and efficient use of HOME funds, the Director of the Department of Commerce may reallocate up to 15% of the total HOME allocation among HOME Competitive and HOME Single-Family Noncompetitive (Homebuyer Assistance) grant categories, depending upon the needs in the state during the Plan Year. A reallocation of more than 15% of the total allocation, or the creation or elimination of a grant category will be considered a substantial amendment to this *2019–2020 Annual Action Plan* and would require further steps as identified within the Citizen Participation Plan section of the *2015–2020 Consolidated Plan*. Reallocations may also be made of any remaining balances within a grant category within the last three months of a 24-month obligation deadline to meet the HUD obligation requirements. Reallocations or awards may not be made until at least 15% or $450,860, of the Community Housing Development Organization (CHDO) set-aside requirement has been obligated.

The National Housing Trust Fund (HTF) is a source of funding for housing in Montana that was first signed into agreement on December 30, 2016. HTF provides funds to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low-income households, including homeless families. This *2019–2020 Annual Action Plan* includes information regarding the State of Montana allocation of HTF funds during Plan Year Five. Governor Bullock designated, and HUD has acknowledged, Commerce as the agency to administer HTF funds for the State of Montana.

The chart below describes the HUD resources to be used across the state to achieve the objectives of each program.

Table 5. Expected Resource – Priority Table

Program	Source of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of Con Plan	Narrative Description
		Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	Public/Federal	$6,356,042	$50,000	$1,500,000	$7,826,521	$13,826,521	State Allocation; CDBG funds will be matched in some categories by units of local government; state funds will be used in order to meet CDBG Program match requirements.
	Uses of Funds: Planning, Acquisition, Economic Development, Housing, Public Improvements, Public Services, Administration						
HOME	Public/Federal	$3,005,732	$100,000	$0	$3,105,732	$3,105,732	State Allocation; HOME funds will be matched with additional resources by sub-recipients who receive HOME funds for Housing Tax Credits (HTC) rental housing development; eligible CHDOs and local governments as applicable to HUD regulations will provide matching funds within their acquisition, rehabilitation, and resale projects.
	Uses of Funds: Acquisition, Homebuyer Assistance, Rehabilitation, New Housing Development, Administration						
ESG	Public/Federal	$700,400	$0	$0	$700,400	$677,704	State Allocation; ESG funds will be matched with additional resources by sub-recipients who receive ESG funds.
	Uses of Funds: Financial Assistance, Overnight Shelter, Rapid re-housing, Rental Assistance Services, Homeless Prevention, Street Outreach						
HOPWA	Public/Federal	$0	$0	$0	$0	$0	Montana only receives HOPWA competitive funds.
	Uses of funds: Permanent housing facilities, Permanent housing placement, Short term rent, mortgage, and utility, Short term or transitional housing facilities, Supportive services, Tenant-Based Rental Assistance (TBRA)						
HTF	Public/Federal	$3,000,000	$0	$885,000	$4,185,000	$4,185,000 $	State Allocation
	Uses of funds: Acquisition, Demolition, and Reconstruction to support Rental Housing, Rehabilitation of Rental Housing, New Rental Housing Development, Administration						

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

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

The CDBG program requires 50% match for economic development (ED) projects. This match can come from a variety of sources, including cash investment, bank loans, state or federal loan

programs, or grants. The majority of CDBG-ED grants are at least partially matched with funds from the state Big Sky Economic Development Trust Fund, the federal Economic Development Agency, private bank loans, or owner equity.

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

The HOME program requires 25% match funding for projects. 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, cash, and the value of donated land. Funds will also be leveraged with resources from CHDOs, which may be funded with HOME funds through the CHDO set-aside (15%). Awards for CHDO activities will be given preference over non-CHDO activities and the HOME program may not award any project activities until at least 15% of HOME program funds have been allocated to meet the HUD CHDO set-aside requirement, documenting obligation of funds during the 24-month HUD timeline.

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

No match is required for CDBG housing and neighborhood renewal grants, but the applicants' ability to leverage other private, local, state, or federal funds will be considered in ranking a proposed project for CDBG housing and neighborhood renewal grant funding.

No match is required under the HTF program. This program provides a much-needed source of leveraging for other funding programs aimed at the preservation and expansion of the rental

housing stock in Montana. In administering the HTF program, Commerce will use a competitive application process to award funds to recipients and subgrantees.

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

The State of Montana does not anticipate that any publicly owned land or property will be used to address the needs identified in the *2018–2019 Annual Action Plan*. The majority of state-owned land is either maintained as state recreational land or managed so as to obtain the highest financial return possible for the state's K-12 public school system and other beneficiaries, as mandated by Montana statute. Local entities leveraging CDBG, HOME, or HTF grant funds may use publicly owned land or property to help accomplish a local project on a case-by-case basis, and in most cases, such donations or offers will be considered local match resources.

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

Goals Summary Information

Below is information on the goals for Plan Year Five for each of the *2015-2020 Consolidated Plan* programs.

Table 6 – Goals Summary

#	Goal Name	Years	Category	Area	Needs Addressed	Funding	Goal Outcome Indicator
1	**Preserve and Construct Affordable Housing**	April 1, 2019 to March 31, 2020	Affordable Housing	Statewide	Affordable Housing Preservation and Construction	CDBG: $950,000 HOME: $2,205,159 HTF: $2,000,000	Rental units constructed: 25 Household/Housing Units Rental units rehabilitated: 20 Household/Housing Units Homeowner Housing Added: 2 Household/Housing Units Homeowner Housing Rehabilitated: 4 Household/Housing Units Direct Financial Assistance to Homebuyers: 50 Households Assisted
Preserve and Construct Affordable Housing: The State of Montana will use CDBG, HOME, and HTF funds to fund affordable housing activities that primarily benefit low to moderate income persons.							
2	**Plan for Communities**	April 1, 2019 to March 31, 2020	Non-Housing Community Development	Statewide	Community Planning	CDBG: $500,000	These planning funds will be accessible to all local government across Montana to assist all citizens in the local community with planning needs.
Plan for Communities: The State of Montana will use CDBG funds to help communities engage in various types of planning, including comprehensive community development, housing, public infrastructure, storm water management, bank stabilization, economic development, downtown revitalization, and preliminary project design. A wide variety of activities are funded that primarily serve LMI persons throughout the state.							
3	**Improve and Sustain Public Infrastructure**	April 1, 2019 to March 31, 2020	Non-Housing Community Development	Statewide	Improving and Sustaining Vital Public Infrastructure	CDBG: $2,300,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2,000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
Improve and Sustain Public Infrastructure: The State of Montana will use CDBG funds to improve existing and construct new public water, wastewater, and storm drain infrastructure that primarily serve LMI persons throughout the state.							
4	**Revitalize Local Economies**	April 1, 2019 to March 31, 2020	Non-Housing Community Development	Statewide	Economic Revitalization	CDBG: $1,788,226	Jobs created/retained: 15 Jobs Businesses assisted: 4 Businesses Assisted Public Service activity: 3 Households Assisted Facade treatment/business building rehabilitation:

#	Goal Name	Years	Category	Area	Needs Addressed	Funding	Goal Outcome Indicator
							1 Business
Revitalize Local Economies: The State of Montana will use CDBG funds to create jobs, expand businesses, and revitalize historic downtown business districts. A wide variety of activities are funded that primarily serve LMI persons throughout the state.							
5	**Reduce Homelessness**	April 1, 2019 to March 31, 2020	Homeless	Statewide	Reducing Homelessness	CDBG: $450,000 HOME: $500,000 ESG: $700,400 HTF: $700,000	Tenant-based rental assistance/Rapid Rehousing: 600 Households Assisted Homeless Person Overnight Shelter: 60 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds Added: 5 Beds Homelessness Prevention: 600 Persons Assisted Housing for Homeless added: 15 Household/Housing Units
Reduce Homelessness: The State of Montana will use CDBG, HOME, HTF, and ESG funds to provide permanent housing, shelter, and services for homeless persons and persons at risk of homelessness. Activities may include construction or rehabilitation of housing or shelters, and direct assistance to serve this clientele throughout the state. These activities will be included in the grant categories listed previously.							

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

HOME funds will be used in the following strategic goals. HOME will specifically provide funds to assist extremely low-income, very low-income, moderate-income families, and low-income families (as listed in Table 6). HOME funds will assist with providing 20 households access to new or rehabilitated rental units, providing 50 households opportunities for homeownership, and assisting 5 households who are homeless or at-risk of homelessness with permanent housing. HOME funds will be used in the following strategic goals as listed further in this document.

HTF will specifically provide funds to assist extremely low-income households (as listed in Table 6). HTF funds will assist with providing 15 households access to new or rehabilitated rental units and assisting 5 households who are homeless or at risk of homelessness with permanent housing.

ESG Homeless prevention funds can only help those families that are under 30% AMI, which is either at or below extremely low-income. ESG Rapid Rehousing (RRH) is used to help families that are homeless and presumably have little to zero income. RRH does not require income eligibility at initial assessment.

AP-25 Allocation Priorities – 91.320(d)

Introduction

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

Funding Allocation Priorities

Table 7 – Funding Allocation Priorities

	Preserve and Construct Affordable Housing	Plan for Communities	Improve and Sustain Public Infrastructure	Revitalize Local Economies	Reduce Homelessness
CDBG	15.14%	7.97%	36.64%	28.49%	7.17%
HOME	73.37%	0%	0%	0%	16.63%
ESG	0%	0%	0%	0%	100%
HOPWA	0%	0%	0%	0%	0%
HTF	66.67%	0%	0%	0%	23.33%

Reasons for Allocation Priorities

The State of Montana identified the allocation priorities set forth above for Plan Year Five through the *2015-2020 Consolidated Plan* Needs Assessment and Market Analysis, past experience administering the competitive and non-competitive CDBG and HOME grant programs, and consultation with the state's local government, non-profit, and private sector partners. The allocation priorities also reflect the extent to which eligible entities have other sources of funding available to accomplish each priority.

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

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

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

The priority needs, and the allocation of funds to address those needs, as set forth above, are designed to specifically address the State of Montana's objectives described in this *2019–2020 Annual Action Plan*.

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

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

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

Promote equitable, affordable housing in Montana. Montana is committed to being a great place to live, work, and play, where the quality of life starts with equitable access to affordable housing. Montana will use CDBG, HTF, and HOME funding for preserving and constructing affordable housing that increases mobility and lowers the combined cost of housing and transportation,

advancing solar and other on-site renewable energy installations aligned with the Federal Renewable Energy Target, building social and economic resiliency to severe events, and increasing homeownership and rental opportunities for eligible Montanans, particularly the homeless, disabled, elderly, and other disadvantaged populations.

Reduce homelessness in Montana. Through the MTCoC, Montana and its partners have focused attention to developing the state's coordinated entry processes by region with the goal of ending homelessness in the state. This goal will be accomplished by assisting individuals and families experiencing homelessness to receive rapid quality services and referrals leading to long-term stability of permanent housing and self-sufficiency. Agencies are also dedicated to preventing homelessness through case management, rent and rental arrears assistance, using limited homeless prevention funding. Montana will target CDBG, HOME, HTF, and ESG funds to activities that address housing needs and programs offered to homeless Montanans and/or those at risk of homelessness.

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

Introduction

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

Distribution Methods

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

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

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

To achieve the most effective and efficient use of CDBG funds, the Director of the Department of Commerce may reallocate up to 15% of the total CDBG allocation among all grant categories, depending upon needs in the state during the Plan Year. A reallocation of more than 15% of the total allocation, or the creation or elimination of a grant category, will be considered a substantial amendment to this *2019–2020 Annual Action Plan*, and will require further steps as identified within the Citizen Participation Plan section of the Consolidated Plan. Reallocations may also be made of any remaining balances within any grant category within the last three months of a 15-month obligation deadline to meet the HUD Timely Distribution requirement.

State Program Name: CDBG Housing and Neighborhood Renewal

Funding Sources: CDBG

Describe the State Program addressed by the Method of Distribution: Within the Priority Need of Preserve and Construct Affordable Housing and Reduce Homelessness, CDBG funds are utilized for the acquisition, new construction, and rehabilitation of rental or homeownership units made available to persons at or below 80% of the AMI.

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

CDBG Housing and Neighborhood Renewal Ranking Criteria

	Maximum Possible Points
Community Planning	175
Need for Project	175
Project Strategy	150
Community Efforts and Citizen Participation	100
Benefit to Low- and Moderate-Income Persons	200
Implementation and Management	175
TOTAL MAXIMUM POSSIBLE POINTS	**975**

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

Describe how resources will be allocated among funding categories: For Plan Year Five, the State of Montana will allocate $900,000 in CDBG funds to Housing and Neighborhood Renewal activities. The Housing and Neighborhood Renewal award amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

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

Anticipated Outcome Measure: Five rental or homeowner units will be constructed, and five rental will be rehabilitated.

State Program Name: CDBG Housing Stabilization Program

Funding Sources: CDBG

Describe the State Program addressed by the Method of Distribution: Within the Priority Need to Preserve and Construct Affordable Housing, CDBG funds are utilized for activities to create or preserve homeownership with a specific focus on solving health and safety issues and ADA improvements for single family units. These activities may include acquisition and/or rehabilitation of housing units made available to persons at or below 80% of the AMI.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: CDBG Non-Competitive funds will only be available for non-entitlement units of general local government who have completed an application in collaboration with a CHDO. Applicants who are not working with a CHDO, must receive approval by Commerce. Once approved for funding, the applicant will remain part of the Non-Competitive pool for a period of no more than five years to accomplish the goals established in their application and will gain access to the $500,000 set-aside for this funding category.

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

Describe how resources will be allocated among funding categories: For Plan Year Five, the State of Montana will allocate $500,000 in CDBG funds to Non-Competitive Housing activities. Funds that are not awarded within the first 12 months of the program year, as established in this *2019-2020 Annual Action Plan*, will be made available to the Public Facilities and Housing and Neighborhood Renewal category of funds.

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

Anticipated Outcome Measure: Five homebuyers will be assisted.

State Program Name: CDBG Public Facilities

Funding Sources: CDBG

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

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

CDBG Public Facilities Ranking Criteria

	Maximum Possible Points
Community Planning	175
Need for Project	175
Project Concept and Technical Design	150
Community Efforts and Citizen Participation	100
Need for Financial Assistance	200
Benefit to Low- and Moderate-Income	150
Implementation and Management	175
TOTAL MAXIMUM POSSIBLE POINTS	**1,125**

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

Describe how resources will be allocated among funding categories: For Plan Year Five, the State of Montana will allocate $2,300,000 in CDBG resources to CDBG Public Facilities activities. The Public Facilities allocation amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

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

Anticipated Outcome Measure: 2,000 LMI persons will be served with new or improved public infrastructure systems; 25 LMI households will be served with access to new or improved community facilities that provide support services to LMI households; and 10 units of permanent or temporary housing for homeless individuals or youth will be constructed or rehabilitated.

State Program Name: CDBG Economic Development

Funding Sources: CDBG

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

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

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

Describe how resources will be allocated among funding categories: For Plan Year Five, the State of Montana will allocate $1,788,226 in CDBG resources to CDBG Economic Development activities. The Economic Development allocation amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

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

Anticipated Outcome Measure: 15 jobs will be created or retained; four businesses assisted; three households assisted through public services activities, and one façade treatment or business building rehabilitation will be completed.

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

Funding Sources: CDBG

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

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: CDBG Planning applications are accepted on an ongoing basis and reviewed and ranked according to the extent to which each applicant's proposal addresses the State of Montana's priority needs as set forth in the *2015-2020 Consolidated Plan* and this *2019–2020 Annual Action Plan*. CDBG may give preference to applications received from eligible communities that are working to complete activities in a designate Opportunity Zone.

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

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

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

Anticipated Outcome Measure: Not applicable.

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

Funding Sources: HOME

Describe the State Program addressed by the Method of Distribution: Within the Priority Needs to Preserve and Construct Affordable Housing, HOME funds will be awarded to any eligible applicant (non-profit organizations, CHDOs, and local governments) who may apply for funding individually or with housing partners to provide down payment and closing cost assistance within the maximum amounts established annually by HUD to low-income homebuyers to help them purchase a home. All eligible applicants will be required to identify how HOME funds will meet the goals and objectives of the *2015–2020 Consolidated Plan* and local planning efforts. Assisted homebuyers must complete homebuyer education and counseling, and the purchased home must meet Universal Physical Conditions Standards (UPCS). The purchase price for the property cannot exceed HUD purchase-price limits, which are established annually. Recapture and Resale provisions are enforced through deed restrictions placed on the HOME-assisted units for the applicable period of affordability.

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

Describe how resources will be allocated among funding categories: For Plan Year Five, the State of Montana will allocate $600,000 in HOME resources to HOME Single-Family Noncompetitive activities. The HOME Single-Family Noncompetitive allocation amount is based on beneficiary data

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

Describe threshold factors and grant size limits. All funded HOME Single-Family Noncompetitive activities must meet HOME requirements. HOME funds may be provided in an amount up to 30% of the purchase price limit (as presented in the following table) per homeowner for down payment and closing cost assistance as a zero percent interest, deferred loan. HOME funds may be provided in an amount up to 40% of the purchase price limit per homeowner for down payment and closing cost assistance as a zero percent interest, deferred loan to individuals with a disability or individuals who are an enrolled in a state-recognized Native American tribe. HOME assistance can only be provided to those units where the homeownership value limit does not exceed 95% of the area median purchase price for single family housing (as listed below). The purchase price for the property cannot exceed HUD purchase price limits, recapture provisions are placed on the HOME-assisted units for the period of affordability, assistance is provided as a zero-percent interest, deferred loan, and projects must follow all applicable HOME regulations and guidelines for homebuyer assistance. The purchase price limits for Montana are listed below.

2019 HOME Purchase Price Limits

Metropolitan FMR Area Name	Existing Single Family Home	Newly Constructed Single Family Home
Carbon Co – Billings	$228,000	$270,000
Yellowstone Co – Billings	$221,000	$270,000
Golden Valley Co	$152,000	$270,000
Cascade Co – Great Falls	$171,000	$270,000
Missoula Co – Missoula	$261,000	$270,000
Beaverhead Co	$168,000	$270,000
Big Horn Co	$152,000	$270,000
Blaine Co	$152,000	$270,000
Broadwater Co	$202,000	$270,000
Carter Co	$152,000	$270,000
Chouteau Co	$152,000	$270,000
Custer Co	$152,000	$270,000
Daniels Co	$164,000	$270,000
Dawson Co	$164,000	$270,000
Deer Lodge Co	$152,000	$270,000
Fallon Co	$166,000	$270,000
Fergus Co	$157,000	$270,000
Flathead Co	$247,000	$270,000
Gallatin Co	$298,000	$298,000
Garfield Co	$152,000	$270,000
Glacier Co	$152,000	$270,000
Granite Co	$181,000	$270,000
Hill Co	$157,000	$270,000
Jefferson Co	$252,000	$270,000
Judith Basin Co	$152,000	$270,000
Lake County	$222,000	$270,000
Lewis & Clark Co	$238,000	$270,000
Liberty Co	$152,000	$270,000
Lincoln Co	$179,000	$270,000

Metropolitan FMR Area Name	Existing Single Family Home	Newly Constructed Single Family Home
McCone Co	$171,000	$270,000
Madison Co	$214,000	$270,000
Meagher Co	$152,000	$270,000
Mineral Co	$173,000	$270,000
Musselshell Co	$176,000	$270,000
Park Co	$209,000	$270,000
Petroleum Co	$152,000	$270,000
Phillips Co	$152,000	$270,000
Pondera Co	$152,000	$270,000
Powder River Co	$152,000	$270,000
Powell Co	$152,000	$270,000
Prairie Co	$152,000	$270,000
Ravalli Co	$254,000	$270,000
Richland Co	$226,000	$270,000
Roosevelt Co	$152,000	$270,000
Rosebud Co	$152,000	$270,000
Sanders Co	$202,000	$270,000
Sheridan Co	$152,000	$270,000
Silver Bow Co	$152,000	$270,000
Stillwater Co	$233,000	$270,000
Sweet Grass Co	$176,000	$270,000
Teton Co	$166,000	$270,000
Toole Co	$152,000	$270,000
Treasure Co	$152,000	$270,000
Valley Co	$156,000	$270,000
Wheatland Co	$152,000	$270,000
Wibaux Co	$152,000	$270,000
Limits effective April 1, 2018		

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

State Program Name: Competitive HOME Program
Funding Sources: HOME
Describe the State Program addressed by the Method of Distribution: Within the Priority Needs to Preserve and Construct Affordable Housing and Reduce Homelessness, HOME funds can be used to acquire, rehabilitate, or construct affordable rental units, homeownership units, or permanent housing for homeless individuals or youth. HOME funds will be awarded to any eligible applicant (non-profit organization, CHDO, and/or local government) who may apply for funding individually or with housing partners. Commerce will set aside a minimum of 15% of HOME funds for activities sponsored, developed, or owned by CHDOs. CHDO or CHDO-partnered applicants will receive first consideration on eligible projects that meet the criteria of the Competitive HOME Program. The HOME program may not award any project activities until at least 15% of the HOME program funds have been allocated to meet the HUD CHDO set-aside requirement. All eligible

applicants will be required to identify how the investment of HOME funds will meet the goals and objectives of *2015–2020 Consolidated Plan* and the local planning efforts. Eligible applicants are encouraged to partner with other organizations to provide collaborative and cost-effective projects that will benefit the community and households receiving HOME assistance.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: Competitive HOME applications are ranked according to the applicant's ability to meet the application criteria and align with the goals in the *2015–2020 Consolidated Plan*. HOME program applications, grant application guidelines, the project grant administration manual, and other relevant information and resources are available on the Commerce website at http://comdev.mt.gov/.

Describe how resources will be allocated among funding categories: For Plan Year Five, the State of Montana will allocate $2,105,158 in HOME resources to HOME Competitive activities. The Competitive HOME allocation amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

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

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

State Program Name: HTF Program

Funding Sources: HTF

Describe the State Program addressed by the Method of Distribution: Within the Priority Needs to Preserve and Construct Affordable Housing and Reduce Homelessness, HTF funds will be used to increase and preserve the supply of rental housing for extremely low-income households, particularly the homeless, disabled, elderly, and other disadvantaged households, including homeless families. The HTF funds invested in rental units must not exceed the HOME maximum per-unit subsidy limits and HUD-established HTF rent limits will apply to each HTF-assisted unit. Commerce will not use HTF funds to assist first-time homebuyers to finance housing for homeownership or to refinance existing debt.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: Commerce will accept HTF applications on a competitive basis. Commerce will then prioritize project proposals from eligible entities through a ranking process. Applications will be ranked to determine how closely a project aligns with the intent of the *2015–2020 Consolidated*

Plan and HTF Program goals and objectives and ranking criteria. This is more fully described in the HTF narrative of AP-90. HTF Program applications, grant application guidelines, the project administration manual, and other relevant information and resources are available on the Commerce website at http://comdev.mt.gov/Programs/HTF.

Describe how resources will be allocated among funding categories: For Plan Year Five, Commerce will allocate approximately $2,700,000 in HTF resources to complete HTF program activities, with $2,000,000 designated for preserving and constructing affordable housing and $700,000 designated for reducing homelessness. The allocation amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity. If no applications are submitted to the HTF program to address homelessness activities, then 100% of the funds will be used for housing preservation and new construction activities to benefit extremely low-income households.

Describe threshold factors and grant size limits. All funded HTF activities must meet HTF requirements, including the HOME program's maximum per-unit development subsidy limit for housing assisted with HTF funds. The maximum per-unit subsidy is the same as for the HOME program (24 C.F.R. 93.300(a)) and is calculated using the Uniform Application Form for Montana Housing Programs, available on the Commerce website.

Anticipated Outcome Measure: 5 rental units will be constructed; 5 rental units will be rehabilitated; and 10 units of permanent housing to reduce homelessness will be constructed or rehabilitated.

State Program Name: ESG Program

Funding Source: ESG

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

Describe all of the criteria that will be used to select applications and the relative important of these criteria: Needs assessments and strategic planning are conducted by the HRDCs to ensure the best alignment of resources available with the needs of people of low-income, within the services area and the agencies' ability to provide specific services and the expected outcomes. Partnerships with other organizations are considered essential to eliminate duplication of services

to best meet the needs within the communities. Funding is provided to emergency shelters operating in the various service areas. Reporting of services and outcomes are submitted annually to the National Association of State Community Service Providers (NASCSP) and reported to Congress as part of the Community Service Block Grant (CSBG) Program. The ESG Program Policy Manual is available on the MDPHHS website at http://dphhs.mt.gov/Portals/85/hcsd/documents/ESGPolicyManual.pdf.

Describe how resources will be allocated among funding categories: For Plan Year Five, the State of Montana will allocate the amount of $52,530 to Administration, $70,040 to HMIS, and $577,830 to Program specific activities for a total of $700,400.

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

Anticipated Outcome Measure: 600 households will be served with Rental Assistance and Housing Relocation and Stabilization services; 60 persons will be assisted with overnight shelter.

Montana, South Dakota, and North Dakota are ineligible to receive HOPWA formula funds due to population and need demographics, however, there still exists a need for such housing assistance in our communities. The three states organized a tri-state regional program named "Tri-State Housing Environments for Living Positively (TS HELP)", a partnership between one state agency and four private agencies to apply for competitive HOPWA funds and serve those individuals seeking help. Montana was assigned two sponsor organizations: one representing the western half of the state and one representing the eastern side of the state. One sponsor is in South Dakota and one sponsor is in North Dakota which was determined based on population and need. Sponsor selection was based on the best available organizations to facilitate the grant's mission and purpose, interest, and experience working with individuals living with HIV/AIDS and/or housing related programs. Sponsors have remained the same since inception of the program, running the program effectively in their respective communities, with a couple exceptions. Most recently, one of Montana's sponsors closed and the program was transferred to an essential provider of personal and public health services in the same community that also manages the Ryan White program for the area. The transfer had little effect on client services and will serve as a great example of moving the Housing and Health initiative forward as well as following HUD's most recent encouragement to integrate and utilize HOPWA and the Ryan White HIV/AIDS Program (RWHAP) data sets to improve HIV and housing outcomes for clients accessing services through these programs. Housing coordinators and case managers have built strong relationships and referral systems with not only the Ryan White program in all three states but also their communities' vast client service networks.

With the large geographical area covered by the Tri-State HELP HOPWA program, the entire states of Montana, South Dakota, and North Dakota, the grantee has contracted with Montana State

University to help provide training and technical assistance, monitoring, data collection, Annual Performance Report (APR) reporting, and program support of programmatic issues and resources to assist sponsor agencies.

Discussion

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

AP-35 Projects – 91.220(d)

Discussion

The State has not yet identified or selected any projects to be awarded with CDBG, HOME, or HTF funds for this 2019-2020 funding year. These funds will be awarded through the competitive application processes as described in other sections of this document.

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

For HOPWA, allocation priorities are based upon the current trends of each region's housing market, client assistance numbers as reported in the Annual Performance Reports, Fair Market Rents, and economic stability. Sponsors have been able to effectively use funds to support an increasing demand while HOPWA specific funds remain the same. Obstacles include lack of affordable/safe housing, rural access to medical/social services, decreases in partner funding sources, and lack of additional HOPWA funding.

Commerce allows applications to be submitted from all eligible entities across the state to address underserved needs and provides technical assistance to eligible entities to support successful project submissions. However, funded projects are limited to those that are submitted to Commerce for consideration. Allocation priorities are set based on information gathered from the Consolidated Plan Market Analysis and Needs assessment as well as application submissions. The anticipated benefit and use of funds, to meet the Goal Outcome Indicator, is an estimate based on prior year applications and program trends, as it is unknown what types of applications will be submitted to address community needs during this plan year. Additionally, Commerce programs are often oversubscribed and are unable to meet the needs of eligible entities due to the limited amount of funding available. These factors present obstacles in addressing underserved needs across the state.

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

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

No.

Available grant amounts

Not applicable.

Acceptance process of applications

Not applicable.

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

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

No.

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

Not applicable.

AP-50 Geographic Distribution – 91.320(f)

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

As described in the *2015–2020 Consolidated Plan*, the State of Montana will not target any particular geographic area for special assistance. However, the state will allow any non-entitlement community to apply for CDBG, all communities and non-profits to apply for HOME, and entitlement communities and non-profits to apply for HTF Program funding, dependent on eligible activities and programs. Entitlement communities may apply for HOME funds if the project demonstrates clear segregation between State-assisted units and Entitlement-assisted units. ESG funds are allocated throughout the state.

HTF application guidelines will consider geographic diversity based on data points gathered from federal, state, and regional sources that correspond to the *2015–2020 Consolidated Plan* and HTF Program goals and objectives to serve the homeless and those at risk of homelessness. However, because it is not possible to predict what entities will apply for HTF funding to address local needs, the Geographic Distribution table generated by the IDIS system has been left blank.

Rationale for the priorities for allocating investments geographically

Not applicable.

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

Introduction

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

Table 8 – One Year Goals for Affordable Housing by Support Requirement

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

Table 9 – One Year Goals for Affordable Housing by Support Type

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

Discussion

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

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

The production of new units will be completed, in part, through CDBG, HOME, and HTF resources in coordination with Housing Tax Credits and private financing for rental projects.

Acquisition and rehabilitation of existing units will be completed primarily through the CDBG non-competitive housing program. The acquisition, through down payment and closing cost assistance, of existing single-family units will be completed with HOME resources.

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

Introduction

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

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

This *2019–2020 Annual Action Plan* is for a state grantee, and therefore no summary information is available on the actions planned for multiple PHAs in Montana. This information can be obtained by contacting a given PHA within a designated geographic area.

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

This *2019–2020 Annual Action Plan* is for a state grantee, and therefore no summary information is available on the actions planned for the PHAs in Montana. The state will work on collecting information and supporting activities that encourage public housing residents to become more involved in management and participate in homeownership.

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

Not applicable.

Discussion

This *2019–2020 Annual Action Plan* is for a state grantee, and therefore no summary information is available on the actions planned for multiple PHAs in Montana. This information can be obtained by contacting a given PHA within a designated geographic area.

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

Introduction

Homeless and other special needs activities will be carried out according to the eligible uses of funds for CDBG, HOME, HTF, and the ESG program. Homelessness in Montana may be due to leaving one's home as a result of domestic violence, lack of medical assistance, lack of stable employment, or leaving a state correctional or mental health facility. Many households experiencing homelessness double up with family, friends, or others and may be able to find assistance from a faith-based community for a few days. Non-homeless special needs populations in the state include the elderly and frail elderly, persons living with disabilities, persons leaving a correctional facility, persons with alcohol or other drug addiction, victims of domestic violence, and persons and the families of persons living with HIV. These populations may not be homeless but may be at risk of becoming homeless and, therefore, often require housing and service programs relevant to their specific special needs.

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 special needs groups including those at risk of homelessness. This includes supporting activities to reduce homelessness and encouraging the development and rehabilitation of non-rental facilities for the shelter and transition of temporarily homeless Montanans. Additionally, HOME, CDBG, HTF, and ESG will continue to support efforts by local governments and partner organizations providing HIV services, substance abuse services, disability services, aid to victims of domestic violence, and assistance for the disabled.

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

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

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

Montana uses the Continuum of Care model that originated with H UD with the goal of supporting the transition of homeless individuals into stabilized self-sufficiency in affordable housing. It is important to note that the Montana Continuum of Care feels that multiplying a single night's data into an annual estimate does not necessarily result in an accurate representation.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

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

As indicated in the Needs Assessment and Market Analysis of the *2015–2020 Consolidated Plan*, the longer one is homeless, the more difficult and costly it is to stabilize and re-house that person. During Plan Year Five, the State of Montana will seek to accomplish the following targets for reducing homelessness:

Targets for Reducing Homelessness

STRATEGIES	1. Reallocation of TH to RR or Permanent Supportive Housing (PSH)		2. ESG Rapid Rehousing (Family Only)		3. TANF Short-term Rent Assistance		4. Prioritize Section 8 Vouchers for PSH Graduates		5. Decrease LoS – Increase Turnover PSH to Affordable Housing		6. 50 Montana State-Funded Vouchers		Total New Beds	Total Number Households Served
	Per Year	Total	Per Year	Total	Per Year	Total	Per Year	Total	Per Year	Total	Per Year	Total		
2015	10	10	30	30	10	10	10	10	5	5	20	20	85	27
2016	10	20	15	45	20	30	15	25	5	10	20	40	85	27
2017	10	30	15	60	20	50	15	40	5	15	20	60	85	27
2018	10	30	15	60	20	50	15	40	5	15	20	60	85	27
2019	10	30	15	60	20	50	15	40	5	15	20	60	85	27
Cumulative Total Beds	50		90		90		70		25		100		425	135

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

DPHHS works with the MTCoC to leverage resources and provide increased and coordinated services to homeless households across the state. DPHHS aligns its strategy for reducing and ending homelessness with the CoCs. DPHHS and subgrantees of ESG funding participate in MTCoC strategic planning discussions and attend working meetings.

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

The ESG program coordinates its strategy with the MTCoC to meet the needs of the homeless and those at risk of homelessness at the local level. If it is determined that there is a particularly high need to help individuals being discharged from publicly funded institutions and systems of care, such as health-care facilities, mental health facilities, foster care or other youth facilities, and corrections programs and institutions, then sub-recipient agencies will be assisted, as allowed, through the ESG program. As agencies continue to work in their communities' coordinated assessment/entry process, they will be able to best determine which stream of funding and which organizations can best serve different demographics of need. Because ESG subrecipients are also the local Community Action Agencies (CAAs), they can provide other key services that address health, employment, and education, as well as refer households to organizations with whom they have established relationships and coordinated programs. ESG funds are used to meet the needs of the homeless and those at risk of homelessness at the local level. Activities include rental assistance; financial assistance of rental application fees; security and utility deposits and payments; case management; housing search assistance; support for toll-free telephone referral hotlines for domestic abuse; referral to mainstream resources; and assistance to shelters for victims of domestic and sexual violence, youth homes, and food banks. All HRDCs submit work plans, budgets, and reports outlining which of the allowable activities will be undertaken. In Plan Year Five, HTF funds will also support these activities by increasing and preserving the supply of rental housing for extremely low-income households, particularly the homeless, disabled, elderly, and other disadvantaged populations.

AP-70 HOPWA Goal – 91.320(k)(4)

HOPWA's goals of reducing homelessness in Montana are a combined effort of partnering with regional organizations and participating in local events that target housing opportunities for individuals living with HIV/AIDS who are at risk of becoming or are currently homeless. Nearly all client referrals come from the Ryan White HIV/AIDS Program (RWHAP) and routinely have clients with multiple barriers clients they serve. Sponsors also have strong partnerships with local organizations, Housing Authorities, Homeless Coalitions, and Community Health Clinics, and they participate regularly in Homeless Connect Events.

Open Aid Alliance and HRDC VII partner with their local and statewide MTCoC; they assist in state and local MTCoC planning efforts, utilize the Montana HMIS, participate in Point-In-Time and Housing Inventory Counts at the local level, and in the efforts to develop a coordinated assessment for Montana. The HOPWA Program is part of the H2 Initiative in Montana.

By the request of the program's participating agencies and in order to serve more individuals, DPHHS will administer a cap on Short-Term Rent, Mortgage, and Utility (STRMU) assistance payments so that rent and mortgage assistance would be limited or capped at FMR in similarity to the tenant-based rental assistance. The planned cap is allowable per 24 CFR Part 574.

HOPWA provides housing assistance through two HUD-funded competitive grant awards. Goals are as follows:

HOPWA MT-H170014 grant 2019 goals: Number of households per budget line item	
Short-term rent, mortgage, and utility assistance payments	37
Tenant-based rental assistance	52
Supportive Services	113
Permanent Housing Placement	10
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	N/A
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	N/A
Total	212

HOPWA MT-H18000 2019 goals: Number of households per budget line item	
Short-term rent, mortgage, and utility assistance payments	18
Tenant-based rental assistance	64
Supportive Services	86
Permanent Housing Placement	15
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	N/A
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	N/A
Total	183

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

Introduction

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Discussion

Through the above identified actions, the State of Montana will continue to address barriers to affordable housing. The State of Montana is committed to addressing these barriers throughout the implementation of the *2015-2020 Consolidated Plan* and through its partners to address goals and objectives identified in the *2015-2020 Analysis of Impediments*.

Commerce and DPHHS staff continue to engage a steering committee to discuss and implement actions related to the 2015-2020 Analysis of Impediments. The group has discussed the involvement from other interested parties to begin to address the impediments through the established goals and objectives. Additional work will continue through the *2019–2020 Annual Action Plan* year to continue to address the impediments and achieve the goals and objectives, including increased work related to the development of a statewide Affirmative Fair Housing Plan.

AP-85 Other Actions – 91.320(j)

Introduction

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

Actions planned to address obstacles to meeting underserved needs

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

Actions planned to foster and maintain affordable housing

The State of Montana has identified preserving and constructing affordable housing as one of its high priority needs. As set forth in the *2015–2020 Consolidated Plan*, actions planned to foster and maintain affordable housing include developing additional rental housing, developing additional homeownership units, providing down payment assistance, providing owner-occupied rehabilitation activities, and other housing activities. These actions will be funded through the HOME, CDBG, and HTF, as set forth above.

Actions planned to reduce lead-based paint hazards

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

practices to prevent lead contamination. In addition to complying with Title X, UPCS inspections will be performed at rental properties assisted with HTF, HOME, Section 8, and other public rental properties throughout the state.

The Community Development and Housing Divisions added HUD's online 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 Commerce are trained in identifying deteriorated paint and increased risk of the presence of LBP hazards.

Units that ESG and HOPWA eligible households live in or move into must adhere to LBP requirements as set forth by HUD.

Actions planned to reduce the number of poverty-level families

The State of Montana, in coordination with non-profit organizations and the private sector, can influence the chances of helping individuals and families in poverty by supporting local and regional efforts to improve family and individual incomes. All of the strategies and priorities identified in the *2015–2020 Consolidated Plan* and this *2019–2020 Annual Action Plan* target the improvement of economic conditions of Montanans of lower income, from the rehabilitation and construction of affordable housing, homebuyer assistance, and temporary shelter services to investment in compact, walkable development where efficiencies of public infrastructure, community services, and employment centers encourage health, vital, and resilient communities through the use of CDBG, HOME, HTF and ESG funds.

Actions planned to develop institutional structure

Gaps in the institutional delivery system exist primarily due to funding limitations that are outside the control of the State of Montana. CDBG, HOME, HTF and ESG resources are not adequate to meet the needs of Montanans with less than low to moderate incomes particularly the homeless, disabled, elderly, and other disadvantaged populations. However, the ability to effectively relay information regarding existing grant opportunities and technical assistance from the State of Montana for eligible entities continues to be one of the State's greatest challenges. There are areas of opportunity for increased collaboration vertically and horizontally across and between agencies, organizations, and the private sector to ensure that services are delivered to the greatest number of eligible entities and individuals in the state. During Plan Year Five, the State will actively engage across state agencies and with the public and private sectors in broad discussions and educational opportunities regarding the economic, social, environmental, and health benefits of

creating walkable, resilient communities with increased opportunities and access to affordable housing, community services, existing public infrastructure efficiencies, and jobs.

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

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

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

Discussion

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

To further the goals and objectives of the CDBG, HOME, and HTF programs, the Anti-displacement and Relocation Assistance Plan is included with this Annual Action Plan.

ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE PLAN

Montana CDBG, HTF, and HOME Programs

1. The Montana Department of Commerce (Commerce) encourages applicants to design their projects to temporarily relocate or displace as few persons as necessary to meet the goals and objectives of the State CDBG, HTF, and HOME programs and critical local community development needs.

2. Commerce will carefully consider any proposed relocation and/or displacement activities during application ranking.

3. When a proposed CDBG-, HTF-, or HOME-funded project could result in direct or indirect involuntary displacement of community residents (including businesses), the applicant must prepare a plan which describes the actions to be taken to assist such persons to remain in their neighborhoods as required by 24 CFR 570.606. To provide equitable and reasonable assistance to those persons who will be involuntarily and permanently displaced, the plan must include relocation assistance as required in 24 CFR 42.350. The adequacy of any displacement mitigation plan will be assessed by the Commerce on the basis of:

   -- Its responsiveness to temporarily relocated and displaced persons;
   -- The timeliness of the remedy; and
   -- the reasonableness of projected costs, including safeguards that will be established to assure prudent use of scarce public resources.

4. Grant recipients must replace on a one-for-one basis all occupied and vacant habitable low- and moderate-income dwelling units demolished or converted to a use other than as low- and moderate-income housing. The one-for-one replacement requirement will not apply if the U.S. Department of Housing and Urban Development (HUD) finds there is an adequate supply of available, vacant low- and moderate-income dwelling units in standard condition in the area.

5. Commerce will require CDBG, HTF, and HOME recipients to provide benefits to any person involuntarily and permanently displaced as a result of CDBG-, HTF-, and/or HOME-funded activities in accordance with the Uniform Relocation Assistance and Real Property Act.

6. Commerce will require all CDBG, HTF, and HOME recipients to certify that they will comply with both this and their own residential anti-displacement and relocation assistance plan.

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

Introduction

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

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

Other CDBG Requirements

1. The amount of urgent need activities	$0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income	Minimum 70%
Overall Benefit – A consecutive period of one, two, or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	One-year period: 70% 2019-2020 AAP is the only year covered in this AAP

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

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

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

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

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

Commerce will use recapture provisions for the Montana HOME program for all HOME-assisted homebuyer projects including down payment assistance, closing costs, or other HOME assistance provided directly to the homebuyer. State recipients and sub-recipients are eligible entities (entities) to carryout HOME-assisted homebuyer activities and must use the recapture provisions when HOME assistance is provided directly to the homebuyer. The HOME-assisted homebuyer subsidy can be structured through zero-percent interest or low interest loans, grants, deferred payment loans, or interest rate subsidies.

When Commerce provides HOME assistance as development subsidy only, it will follow the Resale provisions detailed below, in accordance with 24 CFR 92.254(a)(5)(ii)(A)(5), which states "If the HOME assistance is only used for the development subsidy and therefore not subject to recapture, the Resale option must be used."

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

Requirement for Homebuyer Assistance

Recapture provisions will only be used for direct assistance to the homebuyer and resale provisions will be used for all development subsidy. Any of the entities who have elected to provide homebuyer assistance under this program are required to specify their recapture or resale provisions as applicable for the period of affordability. Written agreements for homebuyer assistance activities funded by Commerce will include the appropriate provisions to ensure the period of affordability, principal residency requirements, and any other recapture or resale terms and conditions to comply with HOME regulations.

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

Period of Affordability
The Recapture and Resale provisions are in effect for a period of affordability based on the total amount of HOME funds provided directly to the homebuyer that enabled the homebuyer to purchase the unit or the amount of HOME funds invested in the development of the project. Any HOME program income used to assist the homebuyer or development is included when determining the period of affordability under Recapture or Resale provisions.

The minimum affordability periods for Recapture and Resale provisions are outlined, as follows:

HOME Assistance to Buyer	***Period of Affordability***
Less than $15,000	*5 years*
$15,000 - $40,000	*10 years*
More than $40,000	*15 years*

Written agreement and enforcement mechanisms
Regardless of whether using recapture or resale, entities must establish and enforce provisions through a written agreement with the homebuyers that accurately reflects the resale or recapture provisions, before or at the time of sale. Commerce will use deed restrictions, trust indenture, covenants running with the land, mortgages, or other similar enforcement mechanisms to retain the authority to ensure the provisions being used are in accordance with those stated in the written agreement with the entities. Commerce will specify which enforcement mechanism it will use.

During grant monitoring of the HOME program entities, the State will review the deed restrictions, trust indenture, covenants running with the land, mortgages, or other similar mechanisms placed on the HOME-assisted property to ensure the provisions being used are in accordance with those stated in the written agreement with the entities. During the period of affordability, the entities must complete an annual compliance check to ensure that the initial homebuyer still resides in the property as his/her principal residence. The most current utility statement, proof of paid taxes, or certificate of homeowner's insurance are acceptable documentation.

If a homeowner voluntarily or involuntarily transfers his or her property (e.g., through sale or foreclosure) during the period of affordability, the appropriate recapture or resale provisions will go into effect. Commerce must be notified of a voluntary or involuntary sale or transaction changing ownership, and the applicable recapture or resale provisions must be employed.

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

A. Resale Provisions

Resale provisions will be used when HOME assistance is only used as development subsidy and therefore is not subject to recapture. The resale option is typically used in areas with predominantly high home sales prices, areas subject to rapidly appreciating housing costs, areas with a shortage of affordable homes for sale and no available land to build new homes.

Commerce has adopted the following provisions for resale requirements as specified in the HOME rule at CFR 92.254(a)(5)(i). Under these resale provisions, Commerce will ensure that when a HOME-assisted homebuyer sells his or her property, either voluntarily or involuntarily, during the period of affordability, the following will apply:

1) The property is sold to an eligible low-income household who will use the property as his or her principal residence through the period of affordability;
2) The original homebuyer receives a fair return on investment, (i.e., the homebuyer's down payment (if any is made at the time of purchase) plus capital improvements made to the house); and
3) The property is sold at a price that is "affordable to a reasonable range of low-income buyers."

Ensuring Long Term Affordability
If the housing is transferred, voluntarily or otherwise, during the period of affordability, it must be made available for subsequent purchase only to another buyer whose household qualifies as low income and will use the property as its principal residence. To qualify as low-income, a household's income must be below 80% of the area median income (AMI). An organization awarded HOME funds for housing development must enforce these affordability requirements.

Fair Return on Investment
If a home is sold during the period of affordability, the price at resale must provide the original HOME-assisted homebuyer a fair return on investment. Net proceeds (after senior debt and sales costs) to the seller shall not exceed the sum of:

1. The reimbursement of the original owners down payment and/or closing costs made at the time of initial purchase, if any;
2. The principal paid on the senior debt during the period of ownership;
3. The investment in eligible capital improvements defined as: any individual improvement made specifically to the structure or major system of the HOME-assisted housing unit in which the cost was more than $3,000.00 and where applicable, the work was properly permitted, inspected locally and the actual cost has been documented with third party receipts.

The value of the owner's investment (the sum of 1-3 above) will be adjusted by using the Housing Price Index (HPI) as measured by the Federal Housing Finance Agency. The change in the HPI from the original purchase to the time of sale will be applied to the value of the owner's investment, so that the value of the investments is increased or decreased by the amount of increase or decrease in the housing market overall.

Continued Affordability
In addition to ensuring that the HOME-assisted homebuyer receives a fair return on investment, the entities will ensure that the housing under a resale provision will remain affordable to a reasonable range of low-income homebuyers. The sales price may not exceed a price that is affordable to households with incomes at or below 80% of AMI. To be affordable, a household would be expected to pay no more than 32% of its monthly income for mortgage principal and interest, property taxes, and insurance. And in no case could the price exceed the HOME Program purchase price limits as defined by HUD and provided on Commerce's web site.

B. Recapture Provisions

Direct HOME Subsidy/Amount Subject to Recapture
Commerce has adopted the following provisions for recapture as specified by 24 CFR 92.254 that are outlined in the HOME regulations and in CPD notice 12-003. Homebuyers assisted under HOME will be required to adhere to recapture guidelines applied to their home. An organization awarded HOME funds (the "Subrecipient") for homebuyer assistance will be instructed to use the recapture method and must submit their policy for the applicable recapture method if a home is sold during the period of affordability, to include:
• Recapture of the entire direct HOME subsidy; and
• Owner investment is returned first.

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

Commerce or an entity can never recapture more than the amount of available net proceeds upon voluntary or involuntary sale or transaction changing ownership, unless noncompliance has occurred. Net proceeds is defined as the sale price of the home minus the superior loan

repayment (not including HOME loans) and any closing costs. If the amount to be recaptured is more than the net proceeds (i.e., foreclosure or declining housing markets) the seller would be required to repay the balance of the net proceeds, which could be less than the original HOME direct subsidy.

Recapture of the Entire Direct HOME Subsidy

The following are the conditions under which Commerce will enforce the use of recapture of the Entire Direct HOME Subsidy as a recapture provision. In this recapture provision, Commerce or the entity recaptures the entire amount of HOME subsidy provided to the homebuyer before the household receives proceeds from the sale of the property. This recapture is limited to the net proceeds available from the voluntary or involuntary sale or transaction changing ownership during the period of affordability.

This recapture provision will be enforced in the event of a voluntary or involuntary sale or transaction changing ownership that occurs during the period of affordability years zero through 9, as applicable to the Period of Affordability Table. Enforcement of the recapture provision that occurs during the period of affordability year 10 through year 15 (see Period of Affordability Table) will follow the recapture provision: Owner Investment is Returned First. If the period of affordability is less than 10 years, recapture of the entire direct HOME subsidy will only be used, no other recapture provision will be permitted. This will be enforced through the written agreement with the household.

As an example, if the assisted unit received $12,000 in HOME assistance and the unit is voluntarily or involuntarily sold or a transaction changing ownership has occurred during year 4, the entire direct HOME subsidy ($12,000) would need to be repaid according to the net proceeds calculation. If the assisted unit received $42,000 in HOME assistance and the unit is voluntarily or involuntarily sold or a transaction changing ownership has occurred during year 11, the Entire Direct Subsidy recapture provision would not be triggered, rather the Owner Investment Returned First recapture provision would be triggered.

Owner Investment Returned First

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

Eligible capital improvements include permanent property improvements that improve or enhance the basic livability or utility of the property but are not normal or recurring maintenance

items. The value of capital improvements will be based on the actual costs of the improvements as documented by the homeowner's receipts.

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

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

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

Not applicable.

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

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

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

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

Overarching Goals and targeting include:

1. Addressing the housing needs of families and individuals at risk of homelessness or facing the possibility of homelessness (Homeless Prevention);
2. Increasing the level of assistance programs to families and individuals who are homeless so that they may achieve stable and sustainable housing (Rapid Rehousing); and

3. Providing case management and referral services to families and individuals so they have access to supportive stabilization systems.

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

DPHHS works with the Montana CoC to leverage resources and provide increased and coordinated services to homeless across the state. DPHHS aligns its strategy for reducing and ending homelessness with the CoCs. DPHHS and subgrantees of ESG funding participate in CoC strategic planning discussions and attend working meetings. The Montana CoC prioritizes and ranks homeless projects each year and prepares a consolidated, statewide continuum of care application in response to the Notice of Funding Availability (NOFA). Projects originate from local community continuums of care or a state agency. Project approvals are based upon performance and capacity criteria as well as local needs and HUD priorities.

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

- Standardize eligibility determinations;
- Prevent and end homelessness through direct funding of the most critical services to help people achieve long-term housing stability and avoid becoming homeless again;
- Improve coordination and integration with mainstream services and focus on shortening periods of homelessness;
- Improve coordination within each community's homeless services including services funded by other programs targeted to homeless people;
- Improve targeting of those most in need;
- Improve data collection and performance measurement;

- Allow each community to tailor its program to the particular strengths and challenges within the community; and
- Marshal available resources capitalizing on existing strength and increase efficiency.

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

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

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

Implementation of the Coordinated Entry System in Montana occurred simultaneously with the rollout of a new HMIS; both launched in earnest in September of 2018. Earlier versions of CES were largely paper-based but was fully integrated into the new HMIS including a custom built By-Name-List. The MTCoC board designated the new HMIS Vendor and Lead (Pathways MISI) to also be the statewide CES Lead. While the state CoC is structed around ten districts, CES focuses on hubs which are the largest cities or towns in each district. New statewide CES Standard Operating Procedures were adopted in August of 2018 and while each district is required to comply with the CES P&Ps, they are free to organize their own front doors and can implement more detailed prioritization policies and case conferencing processes. Monthly local CES Leader roundtables are conducted to facilitate peer learning, and to continue trouble shooting and system improvement. Data Dashboards track inflows, outflows, and destinations by state and community. The HMIS/CES Lead conducts monthly CES data quality reports and provides on-site visits as well as one-on-one consultations.

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

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

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

Not applicable.

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

Reporting of services and outcomes are submitted annually to the National Association of State Community Service Providers and reported to Congress as part of the Community Service Block Grant Program. DPHHS provides on-site monitoring of the ESG Program via regularly scheduled monitoring visits by program staff, using a monitoring tool and reviewing a selection of case files. Staff reviews the matching requirements, budget, and performance (both financial and operational) against contracted activities in the approved ESG work plans, and reviews fiscal accountability and timeliness of report submission. This monitoring is part of a comprehensive annual review of all programs funded by the Intergovernmental Human Services Bureau.

6. ***Program Specific Requirements: HOPWA – identify the method for selecting project sponsors (including providing full access to grassroots faith-based and other community organizations)***

Montana, South Dakota and North Dakota are ineligible to receive HOPWA formula funds due to population and need demographics, however there still existed a need for such housing assistance in our communities. It was decided to organize a tri-state regional program named "Tri-State Housing Environments for Living Positively (TS HELP)" a partnership between one State agency and four private agencies in order to apply for competitive HOPWA funds and serve those individuals seeking help. Montana was assigned two sponsor organizations: one representing the western half of the state and one representing the eastern side of the state, one sponsor in South Dakota and one sponsor in North Dakota which was determined based on population and need. Sponsor selection was based on the best available organizations to facilitate the grant's mission and purpose, interest, and experience working with individuals living with HIV/AIDS and/or housing related programs. Housing coordinators and case managers have built strong relationships and referral systems with not only the Ryan White program in all three states but also their communities' vast client service networks.

With the large geographical area covered by the Tri-State HELP HOPWA program, the entire states of MT, SD and ND, the grantee has contracted with Montana State University to help provide

training and technical assistance, monitoring, data collection, APR reporting, and program support of programmatic issues and resources to assist sponsor agencies.

Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)

1. ***How will the grantee distribute its HTF funds? Select all that apply:***
   ☒Applications submitted by eligible recipients
   ☐ Subgrantees that are State Agencies
   ☒ Subgrantees that are HUD-CPD entitlement grantees

2. ***If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".***

HTF recipients and subgrantees include Montana's entitlement communities (Billings, Great Falls, and Missoula) and non-profit organizations. HTF recipients and subgrantees are eligible to apply for HTF funding, alone or in partnership. Non-entitlement local governments may apply in partnership with an eligible subgrantee. Non-profit organizations must have an Internal Revenue Service 501(c)(3) or 501(c)(4) non-profit designation to be an eligible recipient of HTF funds. Partner organizations may include for-profit entities, other non-profit organizations, community housing development organizations, human resource development councils, and public housing authorities.

Within the Priority Needs to Preserve and Construct Affordable Housing and Reduce Homelessness, HTF funds will be used to increase and preserve the supply of rental housing for extremely low-income households, particularly the homeless, disabled, elderly, and other disadvantaged populations, including homeless families. The rental units must not exceed the HOME maximum per-unit subsidy limits and HUD-established rent limits will be required for each assisted unit. Commerce will not use HTF funds to assist first-time homebuyers, for homeownership housing financing, or for refinancing existing debt. Commerce will conduct a competitive grant process as described in the following paragraph.

Commerce will accept HTF applications on a competitive basis. Commerce will then prioritize project proposals from eligible entities. Applications will be ranked to determine how closely a project aligns with the intent of the State of Montana Consolidated Plan and HTF Program goals and objectives and ranking criteria. This is more fully described in the HTF narrative of AP-90. HTF

Program applications, grant application guidelines, the administration manual, and other relevant information and resources are available on the Commerce website at http://comdev.mt.gov/Programs/HTF.

3. ***If distributing HTF funds by selecting applications submitted by eligible recipients,***

    a. ***Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR §93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".***

HTF recipients and subgrantees include Montana's entitlement communities (Billings, Great Falls, and Missoula) and non-profit organizations. HTF recipients and subgrantees are eligible to apply for HTF funding, alone or in partnership. Non-entitlement local governments may apply in partnership with an eligible subgrantee. Non-profit organizations must have an Internal Revenue Service 501(c)(3) or 501(c)(4) non-profit designation to be an eligible recipient of HTF funds. Partner organizations may include for-profit entities, other non-profit organizations, community housing development organizations, human resource development councils, and public housing authorities.

    b. ***Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".***

Eligible applicants must complete an application adhering to the requirements outlined in the HTF Application Guidelines. Commerce will review applications and award funds to those projects most closely aligned with the goals and objectives of the program.

    c. ***Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".***

Eligible applicants must provide responses in the application to the following ranking priorities.

- Geographic Diversity and Housing Needs
- Capacity of the Applicant
- Affordability and Financial Feasibility
- Appropriate Design and Long-Term Solution
- Long-term Planning and Management
- Readiness to Proceed

Eligible applicants must also provide signed certifications, supporting documentation, budget, implementation schedule, management plan, market analysis, and other documents that may include a Preliminary Architectural Report or Capital Needs Assessment, depending on new construction or rehabilitation, to demonstrate the project's ability to meet the HTF program guidelines.

Commerce will use the HTF allocation to increase and preserve the supply of rental housing for extremely low-income families, giving preference to the homeless, disabled, elderly, and other disadvantaged populations;

1. Eligible project activities can generally be any of the following that result in units that can be occupied by income-eligible households at the completion of the HTF funded project:
    a. Demolition of existing substandard housing that is not suitable for rehabilitation, or of non-residential structures that are not suitable for conversion to housing units;
    b. Site improvements, such as landscaping, paving, sidewalks, curbs and gutters, on-site utilities, etc., related to rehabilitation or new construction of rental housing;
    c. Construction of new rental housing units;
    d. Rehabilitation of existing substandard rental housing that is suitable for rehabilitation;
    e. Conversion of existing non-housing structures into housing units; and/or
    f. Reconstruction of an existing rental housing project.

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Commerce will prioritize applications for all qualified projects based on the metrics listed below. Projects located in counties with a higher total score will receive low, medium, or high funding priority. Priority is calculated using the following metrics compiled by Commerce, using the most current American Community Survey data:

a. Percentage of families in poverty;
b. Available and affordable housing units;
c. Rental housing cost burden;
d. Transportation plus housing cost burden;
e. Substandard housing conditions; and
f. Percentage of total population experiencing homelessness.

e. ***Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".***

Commerce considers in the Readiness to Proceed Priority the project's ability to obligate HTF funds and undertake eligible activities within nine (9) months of award and assesses whether projects can be completed and occupied within 4 years of award.

f. ***Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".***

All HTF units will remain affordable as HTF units for a minimum of 30 years by demonstrating a supported cash flow through the HTF 30-year period of affordability, achieved through a request for HTF Operating Assistance and/or with the documented availability of federal, state, or local project-based rental subsidy.

All funded HTF activities must meet HTF requirements, including the HOME program's maximum per-unit development subsidy limit for housing assisted with HTF funds. The State has elected to use maximum per-unit subsidy limits for the HOME program (24 CFR 93.300(a)), which are calculated using the Uniform Application Form for Montana Housing Programs available on the HTF website.

Applicants must submit this information through the Uniform Application for Housing Programs to describe and document how the project will maintain a positive cash flow through the minimum required 30-year period of affordability. Projects with partner funding for which additional years of affordability are required or requested must demonstrate cash flow throughout the additional term. As part of that demonstration, the applicant will be required to describe and document:

- The need for any request for HTF Operating Assistance funds; and/or
- The applicant's ability to provide federal, state, or local project-based rental subsidy.

g. ***Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".***

The HTF application requires projects to have at least a 30-year period of affordability, during which the property must meet income-eligibility and rent limit requirements. During the period

of affordability, the grantee will need to provide a certification of compliance. Additionally, the Affordability and Financial Feasibility Priority includes additional questions regarding the financial viability of the proposed project to ensure that:

- The grant will only be an amount necessary to provide quality affordable housing that is financially viable for at least the statutorily required period of affordability; and
- The sources and uses of funds (including any operating cost assistance and reserves) for the project are reasonable and will not provide an undue benefit.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Appropriate Design and Long-Term Solution Priority requires the applicant to respond to questions to determine the extent to which an applicant demonstrates that the project aligns with and will contribute to the achievement of the Consolidated Plan goals and objectives as well as other factors, including but not limited to, broadband internet connectivity, walkability, visitability, energy efficiency and conservation, smoke-free, and accessibility.

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

While no match is required for the use of HTF funds, Commerce will carefully consider applications that leverage other funding sources to achieve the project activities. Affordability and Financial Feasibility Priority requires the applicant to respond to questions to determine the extent to which the applicant demonstrates that the projects' grant will only be an amount necessary to provide quality affordable housing that is financially viable for at least the statutorily required period of affordability and that the sources and uses of funds (including any operating cost assistance and reserves) for the project are reasonable and will not provide an undue benefit.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes.

5. ***Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".***

Yes.

6. ***Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.***

Yes.

7. ***Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds. The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.***

Commerce uses the HOME maximum per-unity subsidy amounts for the HTF program.

Maximum Per Unit Subsidy		
Bedrooms	**Base**	**Total Subsidy**
0	$61,281 X 240%	$147,074.00
1	$70,250 X 240%	$168,600.00
2	$85,424 X 240%	$205,018.00
3	$110,512 X 240%	$265,229.00
4+	$121,307 X 240%	$291,137.00

8. ***If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.***

Commerce uses the HOME maximum per-unit subsidy amounts for the HTF program.

9. ***Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the***

housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

Commerce has established Rehabilitation standards so that all housing units rehabilitated with HTF funds meet Commerce HTF Rehabilitation Standards (see Attachment A).

The recipient and subgrantee will be required to follow all rehabilitation standards as set forth in 24 C.F.R. § 93.301(b) and the Commerce HTF Rehabilitation Standards, which include but are not limited to:

a. All housing units rehabilitated with HTF funds must meet HTF rehabilitation standards (https://comdev.mt.gov/Programs/HTF). Applicants are strongly encouraged, to the maximum extent possible, to adopt smoke-free requirements in all housing units and include the three basic visitability features that increase access to friends and family for individuals with disabilities (a zero-step entrance, doors with 32 inches of clear passage space, and a wheelchair-accessible half-bathroom on the main floor).
b. Substandard not suitable for rehabilitation means any housing unit or a building containing housing units where 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 of a comparable unit or units.
c. Substandard suitable for rehabilitation means any housing unit or a building containing housing units where the estimated cost of making necessary replacements and repairs is less than 75 percent of the estimated cost of new construction of a comparable unit or units

10. ***Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".***

N/A

11. ***HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".***

☐ The grantee will use the HUD issued affordable homeownership limits.

☐ The grantee has determined its own affordable homeownership limits using the methodology described in §93.305(a)(2) and the limited are attached.

N/A

12. ***Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."***

    Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

The Geographic Diversity and Housing Needs Priority requires the applicant to respond to questions to determine the extent to which the applicant demonstrates that the projects' grant will consider the extent to which the applicant will produce affordable housing to complement existing federal, state, and local efforts to increase the supply of decent, safe, and sanitary affordable housing for extremely low-income (ELI) families, particularly the homeless, disabled, elderly, and other disadvantaged populations.

13. ***Refinancing of Existing Debt. Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between***

rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

N/A

Discussion

No additional discussion.