State of Montana

Consolidated Plan for Housing and Community Development

April 1, 2020 through March 31, 2025

FINAL
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Montana Department of Commerce

Montana Department of Public Health and Human Services

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2020–2024 Montana Consolidated Plan for Housing and Community Development

Plan Year 1 (2020)	April 1, 2020 – March 31, 2021
Plan Year 2 (2021)	April 1, 2021 – March 31, 2022
Plan Year 3 (2022)	April 1, 2022 – March 31, 2023
Plan Year 4 (2023)	April 1, 2023 – March 31, 2024
Plan Year 5 (2024)	April 1, 2024 – March 31, 2025

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Executive Summary

ES-05 Executive Summary - 91.300(c), 91.320(b)

1. Introduction

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

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

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

Purpose of the Consolidated Plan

The 2020-2024 Montana Consolidated Plan for Housing and Community Development is a comprehensive 5-year planning document that outlines how the State will address its housing, planning, infrastructure, economic, and homeless needs, with special emphasis on serving special needs populations. As part of this process, Commerce develops the 2020-2021 Montana Annual Action Plan (AAP), which anticipates how HUD resources received by the State during the first year (Plan Year 1) of the 2020-2024 Consolidated Plan period will be used.

Historically, in tandem with the development of the Consolidated Plan, the State has participated in efforts to develop an Analysis of Impediments (AI) to Fair Housing Choice in Montana. The AI has allowed the State, as well as entitlement communities—the Cities of Billings, Great Falls, and Missoula—to examine barriers to fair housing that exist within the state, including discriminatory actions, omissions, or decisions related to housing; or actions, omission, or decisions that have a discriminatory effect of restricting housing choices for protected classes. With HUD's final rule, issued by Secretary Benjamin Carson on July, 23, 2020[1], Montana is no longer required by regulation to complete an AI; rather, the State is asked to certify that it will "affirmatively further fair housing" in accordance with the 1968 Fair Housing Act and other applicable statutes. In this Consolidated Plan, Montana hereby certifies

[1] https://www.hud.gov/sites/dfiles/ENF/documents/6228-F-01%20Preserving%20Housing%20and%20Neighborhood%20Choice.pdf

that it has and will continue to take steps to affirmatively further fair housing. (Specific barriers to fair housing in the state are detailed in sections SP-55 and AP-75 of this document).

Goals of the Consolidated Plan

The federally established goals of the HUD programs administered by the State of Montana are to provide decent housing, a suitable living environment, and expanded economic opportunities for the state's low- and moderate-income residents. The State of Montana strives to accomplish these goals by maximizing and effectively utilizing all available funding resources to conduct housing and community development activities that serve the economically disadvantaged residents of the state. By addressing need and creating opportunity at the individual and neighborhood levels, the State of Montana aims to improve the quality of life for all residents of the state. HUD's Community Planning and Development (CPD) Programs (i.e., CDBG, HOME, ESG, and HTF) help to develop viable communities by funding activities within the umbrella of the following three goals:

- *Provide decent housing* by supporting appropriate housing for homeless persons and assisting those at risk of homelessness; preserving the affordable housing stock; increasing the supply of permanent affordable housing, without discrimination; increasing the supply of supportive housing for persons with special needs (e.g., the elderly; frail elderly; persons with mental, physical, and developmental disabilities; persons with substance use disorders; persons with HIV/AIDS and their families; public housing residents; Veterans; and victims of domestic violence); supporting homeownership through homebuyer assistance; and providing affordable housing near job opportunities.
- *Provide suitable living environments* by improving the safety and livability of neighborhoods; improving access to quality facilities, infrastructure, and services; reducing the isolation of income groups within communities through de-concentration of low-income housing; revitalizing deteriorating neighborhoods; restoring and preserving properties of special historic architectural or aesthetic value; and conserving energy resources.
- *Expand economic opportunities* by creating and retaining jobs; establishing, stabilizing, and expanding small businesses; providing public employment services; encouraging the employment of low-income persons in projects funded under this plan; providing reasonable mortgage financing rates without discrimination; providing access to capital and credit for development activities that promote long-term economic and social viability of the community; and reducing generational poverty of those living in publicly assisted housing by providing empowerment and self-sufficiency opportunities.

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

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The following list presents the objectives and desired outcomes of the 2020-2024 Montana Consolidated Plan for Housing and Community Development. It is important to note that one of the State's chief objectives and desired outcomes is to address statewide and local challenges resulting from the COVID-19 (coronavirus) pandemic. In addition to prioritizing projects that address the impacts of COVID-19 and resulting health, safety, and economic concerns, Commerce will use CDBG resources to

meet all CDBG National Objectives, which include Low and Moderate Income, Urgent Need, and Slums and Blight. Furthermore, Commerce and DPHHS will use Coronavirus Aid, Relief, and Economic Security (CARES) resources (i.e., "CDBG CARES" and "ESG CARES") to bolster efforts to control the epidemic and mitigate its economic impact.

There may be a need to direct resources by use of project selection criteria, which may be updated annually, based on year-to-year need and local circumstances.

1. Support existing Montana communities:
    a. Target funding toward existing communities to increase their capacity to respond to health, safety, economic, and other needs resulting from COVID-19; strengthen community revitalization efforts; 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, flood prevention plans, and other studies or plans that address health, safety, economic, and other concerns resulting from COVID-19 as well as support the sustainability of local communities, affordable housing, public works investments, vital employment centers, and the environment;
    c. Enhance the unique and resilient characteristics of all communities by investing in healthy, safe, and walkable neighborhoods—rural, urban, or suburban;
    d. Encourage the rehabilitation of existing rental and owner-occupied homes, particularly for those with special needs and the elderly; and
    e. Encourage the development and rehabilitation of community facilities and services located within walkable neighborhoods and/or served by public transportation systems, particularly for those with special needs and the elderly.

2. Invest in vital public infrastructure:
    a. Provide funding preference for infrastructure projects that address the impacts of COVID-19 and health and safety concerns;
    b. 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;
    c. Provide funding opportunities to improve the safety and efficiency of public infrastructure, promote healthy, safe, and walkable neighborhoods, and safeguard the environment; and
    d. Provide funding opportunities to serve eligible Montanans, particularly special needs and elderly populations, with safe, efficient public infrastructure.

3. Enhance Montana's economic competitiveness:
    a. Provide funding preference for economic development and revitalization projects that address the impacts of COVID-19;
    b. 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;
    c. Support comprehensive planning for downtown revitalization, business development, and other studies or plans to attract and retain talent in Montana communities;
    d. Provide job opportunities to eligible Montanans to strengthen communities within the state;

e. 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;
f. Encourage mixed-use development that contributes to broader revitalization efforts in Montana communities; and
g. 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. Provide funding preference for affordable housing projects that address the impacts of COVID-19;
    b. 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;
    c. Encourage housing activities that incorporate energy-efficient design to help advance solar deployment and other onsite renewable energy installations in affordable housing that is aligned with the Federal Renewable Energy Target;
    d. Encourage activities to acquire and/or construct new affordable housing for homeownership or rental in areas where existing investment in infrastructure, facilities, and services leverages multiple economic, environmental, and community objectives;
    e. Encourage appropriate and comprehensive planning, market studies, preliminary architectural reports, and other studies or plans in support of the efficient construction of affordable housing; and
    f. Encourage financial mechanisms that increase homeownership opportunities and provide rental assistance to eligible Montanans, particularly those with special needs and the elderly.

5. Reduce homelessness in Montana:
    a. Provide funding preference for projects that address the shelter and housing needs of Montanans impacted by COVID-19;
    b. Encourage activities that address the housing needs of homeless Montanans and/or those at risk of homelessness;
    c. 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
    d. Encourage the development and rehabilitation of non-rental facilities for the shelter of temporarily homeless Montanans.

3. Evaluation of past performance

Commerce and DPHHS have received annual funding for the CDBG, HOME, and ESG programs for over 5 years. Commerce and DPHHS have received annual funding for the HTF Program for 4 years (beginning 2016). Activities have been completed with reduced administrative budgets while adhering to increased regulatory requirements. The decrease in program funding makes it increasingly difficult to address the needs across the state as programs are oversubscribed for funding. Resources available through these programs are vital to organizations struggling to obtain scarce funding to serve households at or below 80% of area median income (AMI). As demonstrated in past performance reports, these programs have been a critical funding source for constructing senior and health facilities in rural areas, developing

homeless facilities that provide services and support throughout the state, and 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 year during the 2015-2019 period. These documents state the objectives and outcomes identified in each AAP and include an evaluation of past performance, which compares measurable goals and objectives with actual performance. These documents can be found on Commerce's website at https://commerce.mt.gov/conplan/documents.

4. Summary of citizen participation process and consultation process

The Consolidated Plan process provides citizens an opportunity to provide input in the development of the plan and to evaluate and comment on the proposed plan to improve the effectiveness of its covered programs. Montana follows the standards set forth in its Citizen Participation Plan (**Appendix A**) during development and proposal of its Consolidated Plan documents, including the 2020-2024 Montana Consolidated Plan for Housing and Community Development and the 2020-2021 AAP. Of note, to safeguard public health and safety and allow for more flexibility as needed, the State updated its Citizen Participation Plan to provide for virtual outreach (e.g., telephone blast messages, emails, Facebook ads) and virtual meetings (e.g., webinars, Facebook and Instagram live streams). Additionally, in accordance with HUD guidance and in an effort to be responsive to critical needs, the State allowed for a minimum 5-day public comment period in certain circumstances to expedite the process by which plans are updated and programs implemented. Finally, it is worth noting that the State, in accordance with flexibilities provided by HUD through a Mega Waiver, developed the plan through April 2021, although development was initially planned through August 2020. By extending its timeline, the State provided the public and stakeholders with more time to consider COVID-19 and comment on emerging needs.

Commerce and DPHHS provided multiple opportunities for the public and stakeholders to comment on the creation and development of the draft 2020-2024 Montana Consolidated Plan for Housing and Community Development and the 2020-2021 AAP. First, in November and December 2018 the Departments conducted a Fair Housing Survey (**Appendix B**). Then, in February and March 2020 they conducted a Housing and Community Development Survey (**Appendix B**). To promote the Housing and Community Development Survey, Commerce and DPHHS developed a flyer with scan code, provided information on the Consolidated Plan webpage, and sent invitations to participate to approximately 5,000 contacts. When the Housing and Community Development Survey closed in March 2020, over 300 respondents had completed it. The Departments also held several focus groups to garner information from beneficiaries and stakeholders about affordable housing, economic development, community and public facilities or "infrastructure," planning, and homelessness with the aim of determining local and statewide needs and informing plan goals.

Commerce and DPHHS's first public meeting on March 23, 2020, sought input on the development of the draft 2020-2024 Montana Consolidated Plan for Housing and Community Development and 2020-2021 AAP. Commerce and DPHHS's second public meeting on April 14, 2021, sought feedback on the published draft 2020-2024 Montana Consolidated Plan for Housing and Community Development and 2020-2021 AAP. Both meetings were limited to remote participation due to concerns about COVID-19. Commerce announced the public meetings by emailing notices to approximately 5,000 contacts and publishing advertisements in newspapers across Montana. Approximately 22 individuals participated in the first meeting via webinar or phone. Approximately 16 individuals participated in the second meeting via webinar or phone.

Consistent with Montana's CPP and in accordance with Montana's CPD Mega Waiver, the State provided 7 days' notice of the second public meeting and 16 days for the public to review the draft Consolidated Plan and provide comment.

Recordings of and/or minutes for each public meeting and focus group are available on Commerce's website at https://commerce.mt.gov/conplan. Documentation of meetings (presentations, minutes, and official transcripts) are provided as **Appendix C**.

5. Summary of public comments

Verbal comments regarding the development of the draft 2020-2024 Montana Consolidated Plan for Housing and Community Development and draft 2020-2021 AAP were received during the public meeting on March 23, 2020. Commerce accepted comments through April 23, 2020, but did not receive written comments subsequent to the public meeting. All comments received were considered and incorporated into the draft documents.

Verbal comments regarding the published draft 2020-2024 Montana Consolidated Plan for Housing and Community Development and draft 2020-2021 AAP were received during the public meeting on April 14, 2021. Commerce accepted comments through April 23, 2021, and received one written comment subsequent to the public meeting. All comments received were considered and incorporated into the final documents.

A summary of all public comments received during the development of and public comment periods for the draft 2020-2024 Montana Consolidated Plan for Housing and Community Development and draft 2020-2021 AAP are provided as **Appendix D**. Additionally, minutes and/or official transcripts of meetings are published on Commerce's website at https://commerce.mt.gov/conplan and provided as **Appendix C**.

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

All comments were considered during the development of the draft 2020-2024 Montana Consolidated Plan for Housing and Community Development and draft 2020-2021 AAP. A summary of public comments or views received on the draft 2020-2024 Montana Consolidated Plan for Housing and Community Development and draft 2020-2021 AAP that are not accepted, if any, and the reasons for not accepting them are provided as **Appendix D**.

7. Summary

The 2020-2024 Montana Consolidated Plan for Housing and Community Development functions as:

- A comprehensive 5-year planning document outlining the use of HUD funds primarily in the non-entitlement areas of Montana that identifies the state's housing, planning, infrastructure, economic, and homeless needs, with special emphasis on special needs populations, and the respective, planned resource investments to satisfy those needs;
- A participatory public process among citizens, organizations, businesses, and other stakeholders;
- An application by the State of Montana for federal funds under HUD's formula grant programs;
- A strategy document to be followed in carrying out HUD's programs in Montana; and
- A management tool for assessing state performance in carrying out HUD's programs in Montana.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

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

The following are the agencies responsible for preparing and administering the 2020-2024 Consolidated Plan for Housing and Community Development and 2020-2021 AAP and those responsible for administration of each grant program and funding source.

Table 1 – Responsible Agencies

Agency Role	Name	Department/Agency
Lead Agency	Scott Osterman, Director	Montana Department of Commerce
CDBG Administrator	Cheryl Cohen, Interim Division Administrator	
HOME Administrator		
HTF Administrator		
ESG Administrator	Gene Hermanson, Division Administrator	Montana Department of Public Health and Human Services
HOPWA Administrator		

Narrative

Commerce is the lead agency overseeing the development of the 2020-2024 Montana Consolidated Plan for Housing and Community Development and 2020-2021 AAP. Commerce administers the CDBG, HOME, and HTF programs covered by this plan. DPHHS administers the ESG Program as well as Montana's cooperative partnership with North and South Dakota: the Housing Opportunities for Persons with AIDS (HOPWA) Program ("Tri-State Housing Environments for Living Positively," or "Tri-State HELP"), which is funded via competitive award and not through a CPD formula grant.

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.200(l) and 91.315(l)

1. Introduction

The 2020-2024 Montana Consolidated Plan for Housing and Community Development was developed in accordance with the 2020 Plan Year Citizen Participation Plan. This process provides a unifying opportunity for units of local government, the State of Montana, the public, interested organizations, and the private sector to take part in shaping Montana's unique communities, vital public infrastructure, economic competitiveness, housing opportunities, and homelessness programs. A list of all agencies, individuals, businesses, and organizations Commerce consulted in the development, preparation, and review of the 2020-2024 Montana Consolidated Plan for Housing and Community Development and 2020-2021 AAP is contained in **Appendix E**.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

The State of Montana strives to improve the delivery of housing and community development assistance to all Montanans. Commerce and DPHHS specifically support policies and programs that promote decent, safe, affordable housing and community services for the homeless and low-income households such as food banks, mental health centers, senior centers, and other facilities. Commerce and DPHHS maintain an email list of parties interested in the HUD-funded programs addressed in the 2020-2024 Montana Consolidated Plan for Housing and Community Development, as well as the planning process (see **Appendix E**). Regular updates and information about the programs and the development, preparation, and review of the 2020-2024 Montana Consolidated Plan for Housing and Community Development are sent to this list, especially when soliciting public comment or providing notice of public meetings.

Commerce's Montana Board of Housing, known in the community and conducting business as Montana Housing (MH), has used a broad-based "team" approach to address affordable housing issues through the Housing Coordinating Team. This model of addressing affordable housing issues is under assessment, and Commerce, is considering how to most effectively engage "team" members in the future.

Commerce and DPHHS, with other key partners, are working collaboratively to address housing and healthcare needs in Montana, as outlined below.

- Medicaid Innovation Accelerator Program (IAP) – Safe and affordable housing is increasingly recognized as an essential component of health and an effective strategy for curbing high health care costs. Seeking to maximize Medicaid to reimburse for supportive housing services with the aim of improving health outcomes and reducing health care expenses, Commerce and DPHHS participated in the IAP in 2019 and 2020. The objectives of this collaboration were to (1) explore the viability of adding to or strengthening pre-tenancy and tenancy-sustaining services and (2) identify and secure housing resources for Medicaid beneficiaries receiving pre-tenancy and tenancy-sustaining services. Part and parcel to this work is an effort in seven of Montana's largest cities to identify frequent users of emergency shelters, emergency rooms, and correctional facilities. The IAP began the important work of aligning housing and healthcare policy in the state.
- Mainstream Vouchers – Commerce and DPHHS successfully completed a joint application for Mainstream Vouchers, which resulted in an award of 78 tenant-based vouchers, to be administered by the state PHA, with a $461,462 annual budget authority in November 2019 and May 2020. Assistance provided through this program will aid non-elderly persons with disabilities in obtaining decent, safe, and sanitary rental housing and connect residents with relevant, voluntary supportive services.
- Interdepartmental Housing Integration Project (IHIP) – With support from the Montana Healthcare Foundation, DPHHS, Commerce, and the MTCoC are establishing an interdepartmental housing and healthcare collaborative that will develop and advance priorities to best serve Montanans across housing and healthcare delivery systems. Areas of particular interest are homelessness, housing insecurity, and health services integration, with a focus on housing that is a social determinant of health. This effort furthers work that began during the IAP and involves identifying and engaging key stakeholders, inventorying current resources and efforts, and collaboratively setting priorities and developing a program structure. IHIP funds will support grant management activities, stakeholder planning and engagement, data analytics coordination, and contracted assistance.

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

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

The Montana Continuum of Care Coalition (MTCoC) is a diverse statewide collaboration of homeless service providers including nonprofits, faith-based organizations, and local and state governments dedicated to planning and coordinating programs to make homelessness rare, brief, and one-time only. The Coalition was established for the purpose of carrying out the duties of the national Continuum of Care 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 2020-2024 Montana Consolidated Plan for Housing and Community Development.

Funds for permanent supportive housing and rapid rehousing across Montana are available on a competitive basis through the State's MTCoC process. The 12 regional MTCoC districts, housed within 9 of the state's 10 Human Resource Development Councils (HRDCs), serve the entire state of Montana with homeless assistance funds. Each of these regional MTCoC districts provides specific services of crisis stabilization and housing supports for veterans, unaccompanied youth, families with children, and chronically homeless individuals and families. All of Montana's regional MTCoC districts were invited to participate in the development, preparation, and review of this document, and serve as repositories for public review of the draft plan.

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

DPHHS has an invested and integral role with the MTCoC. They coordinate strategy with ESG and participate in regular monthly meetings. The MTCoC and DPHHS have a joint agreement and policy statement affirming their mutual guidance for Montana's use of ESG funds including those provided to Montana as part of the CARES Act. Subrecipients of ESG must use Homeless Management Information System (HMIS) and work with their local Coordinated Entry System (CES) to operate the program. DPHHS is no longer the leading agent for HMIS; however, they were involved with the system transition, participating on the transition committee and working with the new providers, Pathways/MISI, to ensure a smooth transition. DPHHS continues to be involved in HMIS developments, training, and regular data cleaning.

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

Table 2 – Agencies, Groups, Organizations who Participated

#	Agency/Group/ Organization	Type(s)	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 and 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	A.W.A.R.E., 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	Included on email listserv
4	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
5	Action Inc.	Nonprofit	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy	Provided input during focus group

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
6	Affiliated Developers, Inc.	Nonprofit	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Non-Homeless Special Needs	Provided input during focus group
7	Anaconda Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
8	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
9	Beartooth Resource Conservation and Development Area, Inc.	Regional organization; nonprofit	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; provided input during focus group
10	Besaw Integrity 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	Provided input during focus group
11	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; provided input during focus group
12	Billings 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
13	Blackfeet Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
14	Butte Public Housing Authority (PHA)	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
15	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; provided input during focus group
16	Butte-Silver Bow Urban Revitalization Agency (URA)	Regional organization	Market Analysis; Economic Development	Provided input during focus group
17	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
18	Chippewa-Cree Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
19	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

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
20	City of Colstrip	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	Provided input during focus group
21	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
22	City of Helena	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	Attended public meeting; provided input during focus group
23	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

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
24	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
25	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
26	City of Shelby	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	Provided input during focus group
27	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

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
28	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; provided input during focus group
29	CTA Architects & Engineers	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Included on email listserv
30	Cushing Terrell	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Provided input during focus group
31	Dawson County Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
32	District IV Human Resource Development Council (HRDC) in Havre	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; provided input during focus group
33	District VI Human Resource Development Council (HRDC) in Lewistown	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
34	District VII Human Resource Development Council (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; provided input during focus group

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
35	District XI Human Resource Development Council (HRDC) in Superior	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; provided input during focus group
36	District XII Human Resource Development Council (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
37	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; attended public meeting
38	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
39	Fort Belknap Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
40	Fort Peck 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
41	Garfield 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	Provided input during focus group
42	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
43	Glasgow Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
44	Good Samaritan Ministries	Nonprofit	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; Economic Development; Anti-Poverty Strategy	Attended public meeting
45	Great Falls Public Housing Authority (PHA)	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
46	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

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
47	Great West Engineering	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Included on email listserv; provided input during focus group
48	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
49	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
50	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
51	Helena Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv; provided input during focus group
52	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
53	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

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
54	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
55	Human Resource Development Council (HRDC) District IX in Bozeman	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; provided input during focus group
56	Intermountain Planners, Inc.	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Provided input during focus group
57	Interstate Engineering	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Provided input during focus group
58	Kadrmas, Lee and Jackson	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Provided input during focus group
59	KLJ Engineering	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Included on email listserv
60	Lake County Community 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; attended public meeting
61	Land Solutions, LLC	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Included on email listserv; provide input during focus group

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
62	Lewis & Clark 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
63	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
64	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
65	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

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
66	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
67	Malta Opportunities	Nonprofit	Market Analysis; Economic Development	Provided input during focus group
68	Midwest Assistance Program	Regional organization	Market Analysis; Economic Development; Anti-Poverty Strategy; Other – Infrastructure	Included on email listserv
69	Miles City Area Economic Development Council	Regional organization	Market Analysis; Economic Development	Attended public meeting
70	Miles City Public Housing Authority (PHA)	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
71	Missoula 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	Attended public meeting; provided input during focus group
72	Missoula Public Housing Authority (PHA)	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv; attended public meeting; provided input during focus group

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
73	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
74	Montana Board of Housing (MH)	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
75	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
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; attended public meeting; provided comment
77	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
78	Montana Department of Environmental Quality (DEQ)	State	Lead-Based Paint Strategy; Other – Infrastructure	Included on email listserv

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
79	Montana Department of Labor & Industry (DLI)	State	Market Analysis; Economic Development; Anti-Poverty Strategy	Included on email listserv
80	Montana Department of Natural Resources and Conservation	State	Economic Development; Other – Infrastructure	Included on email listserv
81	Montana Department of Revenue (DOR)	State	Housing Needs Assessment; Economic Development; Market Analysis	Included on email listserv
82	Montana Department of Transportation	State	Non-Homeless Special Needs; Economic Development; Other – Infrastructure	Included on email listserv
83	Montana Economic Developers Association (MEDA)	Regional organization	Market Analysis; Economic Development	Provided input during focus group
84	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; attended public meeting; provided comment
85	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
86	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
87	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; provided input during focus group
88	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
89	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
90	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
91	Montana West Economic Development	Nonprofit	Market Analysis; Economic Development	Provided input during focus group
92	Morrison-Maierle	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Provided input during focus group
93	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
94	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
95	NeighborWorks Great Falls	Nonprofit	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
96	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; provided input during focus group
97	Nittany GrantWorks	Business leaders	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Provided input during focus group
98	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; attended public meeting; provided comment
99	North Fork Development, LLC	Private Industry	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth; Non-Homeless Special Needs	Provided input during focus group
100	Northern Cheyenne Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	Included on email listserv

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
101	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; provided input during focus group
102	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
103	Poplar (City of) Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
104	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
105	Ravalli County 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
106	Reach Inc.	Nonprofit	Non-Homeless Special Needs	Attended public meeting; provided comment

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
107	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
108	Richland Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
109	Robert Peccia & Associates	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Provided input during focus group
110	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
111	Ronan Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
112	Rural Community Assistance Corporation	Regional organization	Market Analysis; Economic Development; Anti-Poverty Strategy; Other – Infrastructure	Included on email listserv
113	Rural Economic Designs	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Provided input during focus group
114	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
115	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; provided input during focus group

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
116	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; provided input during focus group
117	Stahly Engineering & Associates	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Included on email listserv; provided input during focus group
118	State Bank of Townsend	Business leaders	Housing Needs Assessment; Market Analysis; Economic Development	Included on email listserv
119	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
120	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; attended public meeting
121	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
122	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

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
123	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
124	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
125	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
126	Triple Tree Engineering	Business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other – Infrastructure	Provided input during focus group
127	Trust Montana	Regional organization	Housing Needs Assessment; Homeless Needs – Chronically Homeless; Homeless Needs – Families with Children; Homelessness Needs – Veterans; Homelessness Needs – Unaccompanied Youth	Attended public meeting; provided comment

#	Agency/Group/ Organization	Type(s)	What Section of the Plan Was Addressed by Consultation?	Action
128	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
129	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
130	United Way of the Lewis & Clark Area	Nonprofit	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 public meeting; provided comment; provided input during focus group
131	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
132	Whitefish Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
133	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
134	Yaak Valley Forest Council	Regional organization	Market Analysis; Economic Development	Attended public meeting

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

Table 2 lists those agencies, groups, and organizations that the State consulted with and who took a proactive step in participating in the development of the draft 2020-2024 Montana Consolidated Plan for Housing and Community Development. For a complete list of agencies, groups, and organizations that Commerce contacted regarding the development of the draft plan, see **Appendix E**.

Commerce made every effort to be inclusive of all state and local agencies, groups, and organizations in this planning process.

Table 3 – Other Local / Regional / Federal Planning Efforts

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan
Main Street Montana Project	Governor of the State of Montana	The 2020-2024 Consolidated Plan, the 2020-2021 AAP, and the Governor's business plan for the state 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 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 Montana Continuum of Care	DPHHS	The MTCoC provides funding for many of the same activities provided through the HUD-funded programs addressed in the 2020-2024 Consolidated Plan and 2020-2021 AAP for homeless individuals and families.
2020-2024 Consolidated Plan	City of Billings	The State and the City of Billings share the same primary goals to provide decent housing, a suitable living environment, and expand economic opportunities by preserving 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.
2019-2023 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 by 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.
2020-2024 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 by rehabilitating public facilities to meet ADA accessibility standards and increase energy efficiency; building or rehabilitating transitional housing and providing assistance to homeless or special needs persons; providing support to community service agencies; assisting first-time homebuyers with down payment and closing costs; constructing, purchasing, and rehabilitating new and existing affordable homes for ownership and rental; and funding economic development projects that create jobs for persons of low to moderate income.

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(l))

Commerce worked cooperatively with DPHHS, the Montana Department of Labor & Industry (DLI), and DOR to develop the 2020-2024 Montana Consolidated Plan for Housing and Community Development. Commerce reached out to local governments through a variety of outlets, including surveys and focus groups. **Table 2** provides a comprehensive list of local governments that participated in the Consolidated Plan process.

The State of Montana works continuously to ensure that its state agencies and local governments across the state are informed about and involved in the implementation of the HUD-funded programs covered by the Consolidated Plan. Commerce and DPHHS oversee trainings, presentations, and workshops to provide information about the HUD-funded programs, including eligibility, available funding, and application guidelines. Commerce regularly presents to or participates in events of the Montana Association of Counties, the Montana League of Cities and Towns, the Montana Downtown Association, the Montana Housing Partnership Conference, the Montana Rural Water Conference, and the Qualified Allocation Plan. Commerce and DPHHS provide on-going technical assistance to local governments to help communities prioritize local needs, plan for meeting those needs, and successfully obtaining HUD funds and other funding sources for implementing projects. The State of Montana engages in additional public processes to draft and adopt administrative rules governing the application guidelines and administration manuals for the HUD-funded programs covered in this Consolidated Plan.

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

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

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

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

Narrative (optional):
Not applicable.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

Summarize citizen participation process and how it impacted goal-setting
Three key steps were taken to follow Montana's citizen participation process. First, two surveys regarding housing and community development needs and fair housing needs were circulated. Second, ten focus group meetings on the topics of economic development, homelessness, housing, infrastructure, and planning were held. Finally, Montana held public hearings to provide the public the opportunity to offer input in the development of the 2020-2024 Montana Consolidated Plan for Housing and Community Development and 2020-2021 AAP (Consolidated Plan) documents.

Commerce developed a list of over 5,000 contacts of members of the public; city, town, and county officials; independent and professional consultants; for-profit entities; nonprofit entities; state and federal agencies; and, various other organizations that play a role in the development of a comprehensive housing, community, and economic development strategy for Montana (**Appendix E**). The stakeholders were notified of all aspects of the development of the Consolidated Plan documents, including links to the surveys, invitations to attend public meetings, and notice of availability of draft documents for review and comment. All meetings were limited to remote participation due to concerns about COVID-19; all meeting materials, minutes, and transcripts were made available via the Commerce website; and all Consolidated Plan documents were available in hardcopy at designated repositories throughout the state or upon request.

Commerce developed a scan code and posted links on its website for online survey participation. All surveys were publicized on flyers and visual boards displayed at repositories and other strategic locations. When the Housing and Community Development Survey closed in March 2020, over 300 respondents had completed it (**Appendix B**).

In 2020, Commerce also held ten focus group meetings to gain input from stakeholders with expertise related specifically to affordable housing, economic development, community and public facilities or "infrastructure," planning, and homelessness. Over 50 experts attended the ten focus group meetings. Commerce published meeting minutes or official transcripts for all ten focus group meetings on its website; these minutes and transcripts are provided in **Appendix C**.

Commerce held two public hearings while developing the 2020-2024 Montana Consolidated Plan. The first hearing took place on March 23, 2020; the second hearing was held April 14, 2021. Approximately 38 attendees attended both hearings.

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

Documentation detailing the citizen participation process, along with official transcripts and/or meeting minutes of all meetings held, is available on Commerce's website. Commerce used its website throughout the development of Montana's Consolidated Plan to enhance public participation, increase access to information, and publish plan documents (**Appendix E**). Commerce utilized email and

newspaper advertisements to notify the public of all plan activities (**Appendix E**). Furthermore, Commerce made the plan available in hardcopy at various repositories across the state and upon request.

Citizen Participation Outreach

Table 4 – Citizen Participation Outreach

#	Mode of Outreach	Target of Outreach	Summary of Outreach Outcomes	URL (If applicable)
1	Other – Email Listserv	Non-targeted/ broad community	**Summary of response/attendance**: Commerce announced the development and availability of the Draft 2020-2024 Montana Consolidated Plan for Housing and Community Development and 2020-2021 AAP by emailing notice to the Consolidated Plan contact list. **Summary of comments received**: See **Appendix D** for a summary of comments received and responses provided. **Summary of comments not accepted and reasons**: See **Appendix D** for a summary of comments not accepted and reasons.	See **Appendix E** for a list of citizens and organizations consulted.
2	Public Meeting	Residents of Public and Assisted Housing; Other – Developers of Housing, Economic Development Specialists, Planners, Service Providers, and Individuals Experiencing or At Risk of Experiencing Homelessness	**Summary of response/attendance**: Commerce and DPHHS invited various stakeholders to participate in five focus groups, which included affordable housing, economic development, community and public facilities or "infrastructure," planning, and homelessness. **Summary of comments received**: See Appendix D for a summary of comments received and responses provided. **Summary of comments not accepted and reasons**: See Appendix D for a summary of comments not accepted and reasons.	See **Appendix E** for documentation showing citizens and organizations invited to participate in each of the focus groups.
3	Public Hearing	Non-targeted/ broad community	**Summary of response/attendance**: Commerce and DPHHS held two public hearings: one before publishing the draft plan and one after publishing the draft plan. The first hearing was held on March 23, 2020, and sought input on the development of the plan; the second hearing was held on April 14, 2021, and sought feedback on the published draft plan. Both meetings were limited to remote participation due to concerns about COVID-19. **Summary of comments received**: See **Appendix D** for a summary of comments received and responses provided. **Summary of comments not accepted and reasons**: See **Appendix D** for a summary of comments not accepted and reasons.	N/A

#	Mode of Outreach	Target of Outreach	Summary of Outreach Outcomes	URL (If applicable)
4	Newspaper Ad	Non-targeted/ broad community	**Summary of response/attendance**: Commerce announced the development and availability of the Draft 2020-2024 Montana Consolidated Plan for Housing and Community Development and 2020-2021 AAP by publishing advertisements in newspapers across Montana. **Summary of comments received**: See **Appendix D** for a summary of comments received and responses provided. **Summary of comments not accepted and reasons**: See **Appendix D** for a summary of comments not accepted and reasons.	N/A
5	Internet Outreach	Non-targeted/ broad community	**Summary of response/attendance**: Commerce announced the development and availability of the Draft 2020-2024 Montana Consolidated Plan for Housing and Community Development and 2020-2021 AAP on its website, as well as posted all plan documents for public review. **Summary of comments received**: See **Appendix D** for a summary of comments received and responses provided. **Summary of comments not accepted and reasons**: See **Appendix D** for a summary of comments not accepted and reasons.	https://commerce.mt.gov/conplan
6	Other – Public Repositories	Non-targeted/ broad community	**Summary of response/attendance**: Commerce provided the public with access to hardcopies of the Draft 2020-2024 Montana Consolidated Plan for Housing and Community Development and 2020-2021 AAP at over 20 publicly accessible locations across Montana. **Summary of comments received**: See **Appendix D** for a summary of comments received and responses provided. **Summary of comments not accepted and reasons**: See **Appendix D** for a summary of comments not accepted and reasons.	https://commerce.mt.gov/conplan/repositories

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The following narrative describes Montana's socioeconomic characteristics, including population, race and ethnicity, disability, poverty, and unemployment rates with respect to housing needs. Data in this section was gathered from the U.S Census Bureau, the U.S. Bureau of Economic Analysis, the U.S. Bureau of Labor Statistics, and HUD. This information was used to analyze Montana's current social and economic status and determine prospective trends and patterns in growth over the next 5 years. Tables in this Section were pre-populated with HUD data from the 2013-2017 American Community Survey (ACS), and where indicated, Commerce provided additional data.

Local, state, and federal agencies recognize the role that transportation costs play in calculating the affordability of housing. HUD encourages the coordination of housing, transportation, water, and other infrastructure investments to make neighborhoods more prosperous, allow people to live closer to jobs, save households time and money, and reduce pollution. The Location Affordability Index and other tools help planners, policymakers, and the private sector make decisions about land use, housing, transportation, and economic development by illustrating how housing and transportation costs impact affordability. The State of Montana will use these tools and other data resources to help stakeholders understand, and ultimately reduce, the combined housing and transportation cost burden borne by Montana families.

NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

Summary of Housing Needs

The State of Montana has a population of 1,029,862 with 423,091 households (2017 5-year and 1-year ACS estimates). This represents a 4.1% population increase and a 3.3% household increase since 2010 (2010 Census, 2006-2010 ACS, base year). Montana's median household income for 2017 according to ACS 1-year estimates is $53,386, a 25.1% increase over 2010. **Table 5** details these assessment demographics.

The 2010 Census indicates that the State of Montana has 482,825 housing units, with 409,607 occupied and 73,218 vacant. According to the ACS (most recent 5-year estimates), Montana's 2018 housing stock includes 505,685 total units, of which 423,240 units are occupied with 286,553 owner-occupied units and 136,687 renter-occupied units. This housing stock comprises 80,947 multifamily units, 368,582 single-family units and 55,335 mobile home units. 2018 estimates show a homeowner rate of 67.7% and a renter rate of 32.3% as well as a homeowner vacancy rate of 1.4% and a rental vacancy rate of 6.3%.

The 2019 Montana Housing Status Survey, also known as the Point-In-Time (PIT) Homeless Survey, counted 1,357 homeless persons, including 410 homeless individuals belonging to a family with children, 8 unaccompanied homeless youth, and 939 homeless adults. Of the 1,357 homeless persons counted, 228 are considered chronically homeless.

HUD categorizes housing problems based on three conditions:

1. Overcrowding (more than 1.0 person per room or, in cases of severe overcrowding, more than 1.5 persons per room),
2. Lack of complete plumbing or kitchen facilities, and

3. Cost burden (more than 30% of income goes to housing or, in cases of severe cost burden, more than 50% of income goes to housing).

HUD provides custom tabulations of ACS data from the U.S. Census Bureau, known as the "CHAS" data (Comprehensive Housing Affordability Strategy). These data demonstrate the extent of housing problems and housing needs, particularly for low-income households. These data, specific to Montana, are provided in **Tables 6** through **12**.

Table 5 – Housing Needs Assessment Demographics

Demographics	Base Year: 2010	Most Recent Year: 2017	% Change
Population	989,415	1,029,862	4.1%
Households	409,607	423,091	3.3%
Median Income	$42,666	$53,386	25.1%

Data Source: 2010 Census; 2006-2010 ACS (Base Year), 2013-2017 ACS (Most Recent Year)

Number of Households Table

Table 6 – Total Households Table

Household Type	0-30% HAMFI*	>30-50% HAMFI*	>50-80% HAMFI*	>80-100% HAMFI*	>100% HAMFI*
Total Households**	56,825	54,710	79,915	44,675	176,530
Small Family Households**	13,910	13,905	24,425	17,025	88,525
Large Family Households	2,390	3,215	5,545	3,590	13,010
Household contains at least one person 62-74 years of age	10,960	12,490	19,595	11,125	43,060
Household contains at least one person age 75 or older	8,090	11,075	11,525	4,855	12,585
Households with one or more children 6 years old or younger	7,405	8,005	11,290	6,725	23,845

Data Source: 2012-2016 CHAS

* HUD Median Family Income (HAMFI)

** The highest income category for these family types is >80% HAMFI

Housing Needs Summary Tables

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

Table 7 – Housing Problems 1

Housing Problems	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total*	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total*
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	965	860	590	295	2,710	575	250	345	200	1,370

Housing Problems	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total*	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total*
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	240	570	420	85	1,315	80	85	170	90	425
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	885	630	905	395	2,815	295	495	570	420	1,780
Housing cost burden greater than 50% of income (and none of the above problems)	19,145	4,970	765	155	25,035	10,555	6,045	4,140	870	21,610
Housing cost burden greater than 30% of income (and none of the above problems)	4,525	11,635	7,510	1,025	24,695	4,550	6,265	11,130	5,705	27,650
Zero/negative Income (and none of the above problems)	2,025	0	0	0	2,025	1,900	0	0	0	1,900

Data Source: 2012-2016 CHAS

* Total less than 100% AMI

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

Table 8 – Housing Problems 2

Housing Problems	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total*	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total*
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	25,760	18,670	10,190	1,955	56,575	16,055	13,135	16,355	7,285	52,830
Having none of four housing problems	6,945	8,315	21,560	11,405	48,225	4,595	14,595	31,810	24,025	75,025
Household has negative income, but none of the other housing problems	2,025	0	0	0	2,025	1,900	0	0	0	1,900

Data Source: 2012-2016 CHAS

* Total less than 100% AMI

3. Cost Burden > 30%

Table 9 – Cost Burden > 30%

Household Type	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	6,790	5,295	2,720	14,805	3,420	3,380	5,665	12,465
Large Related	1,140	1,040	590	2,770	530	725	1,250	2,505
Elderly	4,865	4,310	1,550	10,725	7,075	5,885	5,080	18,040
Other	12,270	7,070	3,890	23,230	4,560	2,565	3,535	10,660
Total need by income	25,065	17,715	8,750	51,530	15,585	12,555	15,530	43,670

Data Source: 2012-2016 CHAS

4. Cost Burden > 50%

Table 10 – Cost Burden > 50%

Household Type	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	5,485	1,655	130	7,270	2,685	1,800	1,320	5,805
Large Related	870	190	0	1,060	405	250	180	835
Elderly	3,470	1,450	410	5,330	4,375	2,670	1,680	8,725
Other	10,400	2,075	390	12,865	3,435	1,405	1,050	5,890
Total need by income	20,225	5,370	930	26,525	10,900	6,125	4,230	21,255

Data Source: 2012-2016 CHAS

5. Crowding (More than one person per room)

Table 11 – Crowding Information – 1 of 2

Household Type	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	980	1,020	1,185	435	3,620	335	415	630	425	1,805
Multiple, unrelated family households	120	125	30	35	310	45	135	135	100	415
Other, non-family households	70	60	140	20	290	4	49	0	14	67
Total need by income	1,170	1,205	1,355	490	4,220	384	599	765	539	2,287

Data Source: 2012-2016 CHAS

Table 12 – Crowding Information – 2 of 2

Criteria	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Data Source: 2012-2016 CHAS

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

The 2013-2017 ACS recorded 30.4% or approximately 127,672 single-person households in Montana in 2017. The exact distribution of single-person households among all households by cost burden is unknown. However, since both the elderly and young adults may represent a proportionally greater number of single person households than other adults, the percentage of single person households requiring assistance is likely greater than multiple-person households in the state.

According to the 2019 Montana PIT Homeless Survey, there were 1,357 homeless persons in Montana in 2019. Of those, there were 410 individuals belonging to a family with children, 8 unaccompanied homeless youth, and 939 homeless adults. Of the 1,357 homeless persons counted, 228 individuals are chronically homeless with 194 of the 228 individuals representing adult-only households.

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

Respondents to the 2020 Housing and Community Development Survey ranked the need in Montana for additional services and facilities for both victims of domestic violence and persons with physical and/or developmental disabilities. Results indicate services and facilities are a medium priority for victims of domestic violence while services and facilities are a low to medium priority for persons with physical and/or developmental disabilities.

According to the 2019 PIT count, victims of domestic violence accounted for 18.9% of Montana's homeless population while persons with physical disabilities accounted for 25.0% and persons with developmental disabilities accounted for 35.3%.

What are the most common housing problems?

According to the 2013-2017 ACS, in 2017 27.9% of households in Montana experienced a housing cost burden, meaning they paid 30% or more of their income on housing. Of note, cost burden fell most heavily on households with an annual income of less than $20,000, with 77.1% of this bracket paying 30% or more of their income on housing. Additionally, renters were more cost burdened than homeowners with a mortgage, with 45.4% of renters paying 30% or more of their income on housing versus 29.0% of homeowners paying 30% or more of their income on housing.

Respondents to the 2020 Housing and Community Development Survey indicated that affordable housing for the workforce (especially teachers and service industry workers), the elderly, and the disabled is in short supply throughout the state. Respondents also indicated that affordable housing is especially elusive in resort communities where the tourism-based economy relies heavily on seasonal, low-wage work, home purchase prices are high, and long-term rentals are being converted to short-term rentals.

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

From the above data it appears that households with very low incomes (0-30% AMI) and renters are more affected than others by housing problems. It also appears that the elderly and the disabled are significantly affected by housing problems and that a lack of housing options for the general workforce (especially teachers and service industry workers) impacts communities across the state.

For the elderly, housing problems are expected to persist given that the population over age 60 represents just over 25% of the total population in Montana, and the population age 85 and older is the state's fastest growing age group and is projected to increase 57% by 2030.[2] Due to "fixed" incomes and higher medical and/or supportive services expenses, housing affordability is of particular concern for the aging population.

[2] Montana State Plan on Aging available online at https://dphhs.mt.gov/Portals/85/sltc/documents/AgingReports/MontanaStatePlanonAging2019-2022.pdf

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

Low-income households commonly utilize a higher portion of their income on basic needs including housing. The percentage of Montana households that are housing cost burdened, i.e., that pay 30% or more of their income just on housing, increases as income decreases. Lower-income households (under $50,000 per year) experience housing cost burden at a rate of 51.8% compared with 7.7% of higher-income households ($50,000 or more per year). The correlation between lower incomes and housing insecurity is even more apparent when data for lower-income households is disaggregated. Extremely low-income households (under $20,000 per year) experience housing cost burden at a staggering rate of 77.1% (2013-2017 ACS). Households in financial struggle are at great risk of homelessness, and households who have been homeless face a real risk of becoming homeless again. Of the 1,357 homeless persons counted in Montana during the 2019 PIT Homeless Survey, 228 were considered chronically homeless. While some formerly homeless families and individuals receive rapid re-housing assistance, this is not an entitlement, and many do not receive assistance. Furthermore, even if assistance is secured, the formerly homeless family or individual must obtain a unit that is both available and amendable to such assistance. Low- and extremely low-income households unable to secure affordable housing face difficult choices. If they pursue housing that costs more than what they can afford, they are forced to severely limit the expenditure of income on other necessities such as food and healthcare. If they obtain affordable housing, it may not be decent, safe, or sanitary. Poor or no credit, unemployment or underemployment, and lack of cash savings further jeopardize the ability of low- and extremely low-income households to maintain stable housing.

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

The State of Montana considers persons with a severe housing cost burden, persons living in overcrowded or severely overcrowded housing, persons with severe mental illness, persons living with disabilities, persons with substance use disorders, victims of domestic violence, and persons living with HIV and their families as at-risk per HUD and U.S. Census definitions.

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

Overcrowding, seen in both renter and homeowner households, is one characteristic linked with instability and an increased risk of homelessness. Compared with 5,193 (1.3%) households in 2011, approximately 6,333 (1.5%) households in 2017 lived in overcrowded conditions, defined as 1.01-1.50 persons per room. Compared with 2,056 (0.5%) households in 2011, 2,680 (0.6%) households in 2017 lived in severely overcrowded conditions, defined as more than 1.50 persons per room. These figures represent a 22.0% and 30.4% change from 2011 to 2017 for crowding and severe overcrowding, respectively.

A second housing characteristic linked with instability and an increased risk of homelessness is housing that lacks complete kitchen facilities. A lack of these facilities indicates that the housing is likely unsuitable. In 2017 approximately 4,150 occupied housing units or 1.0% of Montana's housing stock lacked complete kitchen facilities.

A third housing characteristic linked with instability and an increased risk of homelessness is housing that lacks complete plumbing facilities. Similar to housing that lacks complete kitchen facilities, a lack of complete plumbing facilities indicates that the housing is likely unsuitable. In 2017 approximately 2,159 occupied housing units or 0.5% of Montana's housing stock had inadequate plumbing facilities.

Discussion

The 2020 Housing and Community Development Survey asked participants which housing activities are the highest priority. Two hundred and forty-eight participants responded, identifying five priority activities each and ranking them from 1 to 5 with 1 being the highest priority. Responses indicate new construction of affordable rental housing, new construction of affordable for-sale housing, and rental assistance (e.g., vouchers) are the highest priorities (**Appendix B**). Responses also indicate, based on total priority rankings, that new construction of affordable rental housing, new construction of affordable for-sale housing, rental assistance (e.g., vouchers), rental housing rehabilitation, and first-time homebuyer education and down payment assistance are among the top five priorities for housing activities (**Table NA-1**).

Table NA-1 – Need for Housing Activities

	1 (Highest Priority)	2	3	4	5 (Lowest Priority)	Total Priority Rankings 1–5
New construction of affordable rental housing	82	48	30	21	8	189
New construction of affordable for-sale housing	42	41	18	28	21	150
Rental assistance (e.g., vouchers)	22	33	29	25	12	121
Rental housing rehabilitation	11	25	24	27	31	118
First-time homebuyer education and down payment assistance	12	10	34	25	27	108
Development of mixed-income housing (i.e., development that deliberately accommodates families with a range of income levels)	8	17	23	10	29	87
Preservation of federal subsidized housing	16	13	10	14	32	85
Homeowner housing rehabilitation	12	17	16	22	16	83
Energy efficient retrofits (installing energy-efficient windows or lighting, upgrading insulation, etc.)	6	13	19	21	15	74
Demolition/removal of dilapidated, unsafe housing	13	7	16	12	19	67
Development of mixed-use housing (i.e., development that blends residential and commercial, cultural, or other uses into one space)	5	7	9	18	12	51
Development of housing in downtown corridors	4	3	8	12	9	36
Other (specify below)*	11	4	0	0	5	20

Data Source: 2020 Housing and Community Development Survey

*Other priorities, based on survey responses, include development of accessible affordable housing for persons with disabilities and seniors, development of workforce housing, development of year-round shelters, development of tiny homes and small single room occupancy units, development of net zero affordable housing, development of permanent supportive housing with robust service integration, development of affordable housing for persons coming out of incarceration or persons with felony records, assistance (vouchers) for persons with disabilities coming out of state facilities, and investment in manufactured homes.

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Housing problems include four conditions: (1) Lacks complete kitchen facilities, (2) Lacks complete plumbing facilities, (3) Has more than 1.0 person per room, and (4) Has cost burden over 30%. These conditions are addressed throughout this section.

While the Census and ACS do not delve deeply into the physical condition of housing units, selected questions from these surveys do explore various housing difficulties households face. The following tables and narrative consider the housing needs of specific racial or ethnic groups compared with household needs as a whole.

Appendix F provides a more in-depth analysis of Montana's demography.

0%-30% of Area Median Income

Table 13 – Disproportionally Greater Need 0 - 30% AMI

Housing Problems	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems	
	Number	Percent	Number	Percent	Number	Percent
Jurisdiction as a whole	41,810	100%	11,094	100%	3,924	100%
White	35,590	85%	8,845	80%	3,190	81%
Black / African American	210	1%	50	0%	0	0%
Asian	210	1%	4	0%	95	2%
American Indian, Alaska Native	3,595	9%	1,615	15%	470	12%
Pacific Islander	0	0%	0	0%	15	0%
Hispanic	1,400	3%	245	2%	150	4%

Data Source: 2012-2016 CHAS

**The four housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Table 14 – Disproportionally Greater Need 30 - 50% AMI

Housing Problems	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems	
	Number	Percent	Number	Percent	Number	Percent
Jurisdiction as a whole	31,808	100%	22,905	100%	0	0%
White	27,995	88%	19,875	80%	0	0%
Black / African American	254	1%	75	1%	0	0%
Asian	95	0%	130	1%	0	0%
American Indian, Alaska Native	1,360	4%	1,865	17%	0	0%
Pacific Islander	49	0%	0	0%	0	0%
Hispanic	1,255	4%	625	6%	0	0%

Data Source: 2012-2016 CHAS

**The four housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Table 15 – Disproportionally Greater Need 50 - 80% AMI

Housing Problems	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems	
	Number	Percent	Number	Percent	Number	Percent
Jurisdiction as a whole	26,540	100%	53,370	100%	0	0%
White	24,080	91%	47,775	90%	0	0%
Black / African American	130	0%	135	0%	0	0%
Asian	240	1%	275	1%	0	0%
American Indian, Alaska Native	850	3%	2,650	5%	0	0%
Pacific Islander	10	0%	25	0%	0	0%
Hispanic	750	3%	1,290	2%	0	0%

Data Source: 2012-2016 CHAS

**The four housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Table 16 – Disproportionally Greater Need 80 - 100% AMI

Housing Problems	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems	
	Number	Percent	Number	Percent	Number	Percent
Jurisdiction as a whole	9,240	100%	35,434	100%	0	0%
White	8,590	93%	32,455	92%	0	0%
Black / African American	0	0%	74	0%	0	0%
Asian	110	1%	250	1%	0	0%
American Indian, Alaska Native	305	3%	1,270	4%	0	0%
Pacific Islander	0	0%	10	0%	0	0%
Hispanic	135	1%	650	2%	0	0%

Data Source: 2012-2016 CHAS

**The four housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Housing problems disproportionately affected households with lower incomes, as demonstrated in **Tables 13-16**.

A housing problem reported in the 2000 and 2010 Census and subsequent ACS reports is cost burden, which occurs when a household has gross housing costs that range from 30.0 to 49.9% of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, gross housing costs include monthly rent plus utility charges. According to 2017 ACS data, in 2017 27.9% of households in Montana experienced a housing cost burden, meaning they paid 30% or more of their income on housing.

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

Another type of housing problem reported in the 2000 and 2010 Census and subsequent ACS reports is overcrowding, which, as mentioned earlier, occurs when there is more than 1.0 person per room in a household. Overcrowding (1.01-1.50 persons per room) increased from 5,193 (1.3%) households in 2011 to approximately 6,333 (1.5%) households in 2017, a percent change of 22.0%.

According to 2012-2016 ACS, Montana's racial composition is as follows:

- White: 911,907 (89%)
- Black or African American: 4,260 (0%)

- American Indian and Alaska Native: 67,222 (7%)
- Asian: 7,481 (1%)
- Native Hawaiian and Other Pacific Islander: 841 (0%)
- Some other race: 5,158 (1%)
- Two or more races: 26,522 (3%)
- Two races including some other race: 1,435 (0%)
- Two races excluding some other race, and three or more races: 25,087 (2%)

In the income bracket of 0-30% AMI, 210 or 1% of Black/African American households and 3,595 or 9% of American Indian/Alaska Native households have one or more housing problems. In comparison to **Tables 13-16**, these data show that Black/African American and American Indian/Alaska Native households in this group experience housing problems at a disproportionate rate.

In the income bracket of 30-50% AMI, 254 or 1% of Black/African American households have one or more housing problems. In comparison to **Tables 13-16**, these data show that Black/African American households in this group experience housing problems at a disproportionate rate.

In the income bracket of 50-80% AMI and 80-100% AMI, 24,080 or 91% and 8,590 or 93% of White households, respectively, have one or more housing problems. In comparison to **Tables 13-16**, these data show that White households in these groups experience housing problem at a disproportionate rate. These data also show that White households comprise the vast majority of households in the 50-100% AMI income range.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Severe housing problems include four conditions: (1) Lacks complete kitchen facilities, (2) Lacks complete plumbing facilities, (3) Has more than 1.5 persons per room, and (4) Has cost burden over 50%. These conditions are addressed throughout this section.

While the Census and ACS do not delve deeply into the physical condition of housing units, selected questions from these surveys do explore various housing difficulties households face. The following tables and narrative consider the housing needs of specific racial or ethnic groups compared with household needs as a whole.

Appendix F provides a more in-depth analysis of Montana's demography.

0%-30% of Area Median Income

Table 17 – Severe Housing Problems 0 - 30% AMI

Severe Housing Problems	Has one or more of four severe housing problems		Has none of the four severe housing problems		Household has no/negative income, but none of the other severe housing problems	
	Number	Percent	Number	Percent	Number	Percent
Jurisdiction as a whole	32,745	100%	20,170	100%	3,924	100%
White	27,760	85%	16,675	83%	3,190	81%
Black / African American	210	1%	50	0%	0	0%
Asian	150	0%	65	0%	95	2%
American Indian, Alaska Native	2,790	9%	2,425	12%	470	12%
Pacific Islander	0	0%	0	0%	15	0%
Hispanic	1,165	4%	485	2%	150	4%

Data Source: 2012-2016 CHAS

**The four severe housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Table 18 – Severe Housing Problems 30 - 50% AMI

Severe Housing Problems	Has one or more of four severe housing problems		Has none of the four severe housing problems		Household has no/negative income, but none of the other severe housing problems	
	Number	Percent	Number	Percent	Number	Percent
Jurisdiction as a whole	13,908	100%	40,805	100%	0	0%
White	12,290	88%	35,580	87%	0	0%
Black / African American	0	0%	330	1%	0	0%
Asian	24	0%	200	0%	0	0%
American Indian, Alaska Native	720	5%	2,500	6%	0	0%
Pacific Islander	4	0%	45	0%	0	0%
Hispanic	485	3%	1,395	3%	0	0%

Data Source: 2012-2016 CHAS

**The four severe housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Table 19 – Severe Housing Problems 50 - 80% AMI

Severe Housing Problems	Has one or more of four severe housing problems		Has none of the four severe housing problems		Household has no/negative income, but none of the other severe housing problems	
	Number	Percent	Number	Percent	Number	Percent
Jurisdiction as a whole	7,910	100%	72,005	100%	0	0%
White	6,880	87%	64,970	90%	0	0%
Black / African American	55	1%	210	0%	0	0%
Asian	45	1%	465	1%	0	0%
American Indian, Alaska Native	490	6%	3,010	4%	0	0%
Pacific Islander	0	0%	35	0%	0	0%
Hispanic	235	3%	1,810	3%	0	0%

Data Source: 2012-2016 CHAS

**The four severe housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Table 20 – Severe Housing Problems 80 - 100% AMI

Severe Housing Problems	Has one or more of four severe housing problems		Has none of the four severe housing problems		Household has no/negative income, but none of the other severe housing problems	
	Number	Percent	Number	Percent	Number	Percent
Jurisdiction as a whole	2,519	100%	42,164	100%	0	0%
White	2,185	87%	38,855	92%	0	0%
Black / African American	0	0%	74	0%	0	0%
Asian	20	1%	340	1%	0	0%
American Indian, Alaska Native	250	10%	1,325	3%	0	0%
Pacific Islander	0	0%	10	0%	0	0%
Hispanic	45	2%	745	2%	0	0%

Data Source: 2012-2016 CHAS

**The four severe housing problems are:*
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Severe housing problems disproportionately affected households with lower incomes, as demonstrated in **Tables 17-20**.

A severe housing problem reported in the 2000 and 2010 Census and subsequent ACS reports is severe cost burden, which occurs when a household has gross housing costs that represent 50.0% or more of

gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, gross housing costs include monthly rent plus utility charges. According to 2017 ACS data, in 2017 27.9% of households in Montana experienced a housing cost burden, meaning they paid 30% or more of their income on housing; the portion of this segment that is considered severely cost burdened, meaning they paid 50% or more of their income on housing, is not specified.

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

Another type of severe housing problem reported in the 2000 and 2010 Census and subsequent ACS reports is severe overcrowding, which, as mentioned earlier, occurs when there is more than 1.5 persons per room in a household. Severe overcrowding (more than 1.51 persons per room) increased from 2,056 (0.5%) households in 2011 to approximately 2,680 (0.6%) households in 2017, a percent change of 30.4%.

According to 2012-2016 ACS, Montana's racial composition is as follows:

- White: 911,907 (89%)
- Black or African American: 4,260 (0%)
- American Indian and Alaska Native: 67,222 (7%)
- Asian: 7,481 (1%)
- Native Hawaiian and Other Pacific Islander: 841 (0%)
- Some other race: 5,158 (1%)
- Two or more races: 26,522 (3%)
- Two races including some other race: 1,435 (0%)
- Two races excluding some other race, and three or more races: 25,087 (2%)

In the income bracket of 0-30% AMI, 210 or 1% of Black/African American households and 2,790 or 9% of American Indian/Alaska Native households have one or more severe housing problems. In comparison to **Tables 17-20**, these data show that Black/African American and American Indian/Alaska Native households in this group experience housing problems at a disproportionate rate.

No households (any race) experienced severe housing problems at a disproportionate rate in the 30-50% AMI income bracket.

In the income bracket of 50-80% AMI, 55 or 1% of Black/African American households have one or more severe housing problems. In comparison to **Tables 17-20**, these data show that Black/African American households in this group experience housing problems at a disproportionate rate.

In the income bracket of 80-100% AMI, 250 or 10% of American Indian/Alaska Native households have one or more severe housing problems. In comparison to **Tables 17-20**, these data show that American Indian/Alaska Native households in this group experience housing problems at a disproportionate rate.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A household is considered cost burdened when their housing expenses represent more than 30% of their gross income. When housing expenses exceed 50% of their gross income, a household is considered severely cost burdened.

Table 21 and the narrative below consider the cost burdens of specific racial or ethnic groups compared with household needs as a whole.

Appendix F provides a more in-depth analysis of Montana's demography.

Housing Cost Burden

Table 21 – Greater Need: Housing Cost Burdens AMI

Housing Cost Burden	<=30%		30-50%		>50%		No / negative income (not computed)	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Jurisdiction as a whole	296,595	100%	61,850	100%	50,059	100%	4,152	100%
White	271,355	91%	55,710	90%	44,330	89%	3,335	80%
Black / African American	705	0%	335	1%	225	0%	4	0%
Asian	1,590	1%	425	1%	205	0%	100	2%
American Indian, Alaska Native	12,475	4%	2,315	4%	2,635	5%	540	13%
Pacific Islander	90	0%	55	0%	4	0%	15	0%
Hispanic	5,785	2%	1,900	3%	1,655	3%	150	4%

Data Source: 2012-2016 CHAS

Discussion

According to 2012-2016 ACS, Montana's racial composition is as follows:

- White: 911,907 (89%)
- Black or African American: 4,260 (0%)
- American Indian and Alaska Native: 67,222 (7%)
- Asian: 7,481 (1%)
- Native Hawaiian and Other Pacific Islander: 841 (0%)
- Some other race: 5,158 (1%)
- Two or more races: 26,522 (3%)
- Two races including some other race: 1,435 (0%)
- Two races excluding some other race, and three or more races: 25,087 (2%)

2012-2016 ACS data, when compared with CHAS data presented in **Table 21**, show that of cost-burdened households (spending 30-50% of income on housing), 55,710 or 90% of Whites and 335 or 1%

of Blacks/African Americans have disproportionately greater need. Based on this same data, no households (any race) considered severely cost-burdened (spending more than 50% of income on housing) have disproportionately greater need.

In 2017, 27.9% of households in Montana experienced a housing cost burden, meaning they paid 30% or more of their income on housing; the portion of this segment considered severely cost burdened, meaning they paid 50% or more of their income on housing, is not specified.

In the period from 2012 to 2017, cost burden disproportionately affected households with lower incomes, as demonstrated in **Table 21**.

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

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

There is some variability in the number of housing problems and level of cost burden experienced by each population across income categories. However, it is clear that housing problems, and specifically cost burden, disproportionately affect households in the lower income brackets. The group with the greatest need based on the number of households with housing problems within the jurisdiction as a whole was consistently households at or below 30% AMI. And data show that Blacks/African Americans and American Indians/Alaska Natives in this income category have disproportionately greater need than other racial groups. Data also suggest that Blacks/African Americans in the 30-50% AMI range have somewhat disproportionately greater need than other racial groups.

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

None.

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

The largest non-white group in Montana is American Indian/Alaskan Native. This ethnic group is largely located on seven Indian reservations, but the population is disbursed throughout all areas of the state and has a significant presence in select urban centers (e.g., Billings). While needs vary across income categories and geographic locations for this group, data show that American Indians/Alaska Natives in the 30% AMI and below bracket experience disproportionately greater need in comparison to other racial groups.

NA-35 Public Housing – (Optional)

Introduction

The Rental Assistance Bureau within Commerce is the statewide Public Housing Authority (PHA). In Montana, PHAs are setup under state law at the local level to better meet the needs of the local community. The statewide PHA does not own or operate any public housing units but does administer the following programs: Housing Choice Vouchers (HCV); Veterans Affairs Supportive Housing (HUD-VASH); Section 811 Supportive Housing for Persons with Disabilities; Moderate Rehabilitation; Mainstream Vouchers. Commerce also administers the Project Based Section 8 Program for the state of Montana. Commerce is concerned about the number of subsidized housing units and their underlying contracts that are at risk of expiring since expiration would severely affect the affordable housing stock in the state.

It is a significant challenge for tenant-based voucher holders (HCV, HUD-VASH, Mainstream) to find a unit with rent at or below the PHA payment standard, which are set at 110% of the fair market rent, particularly in high cost areas such as Bozeman, Kalispell, Whitefish and Missoula. With vacancy rates extremely low in many of our communities, losing any subsidized housing units would be detrimental.

Tables 22-25 present data on public housing units and public housing residents. Data in these tables have not been updated since the submission of Montana's previous Consolidated Plan (2015-2019) because more current data are not accessible on the PIH Inventory Management System or IMS (previously the PIH Information Center).

Totals in Use

Table 22 – Public Housing by Program Type

	Program Type								
				Vouchers					
							Special Purpose Voucher		
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers in use	0	301	0	3,571	0	3,480	52	0	0

Data Source: PIH Inventory Management System or IMS, formerly PIC (PIH Information Center)
* Includes Non-Elderly Disabled, Mainstream 1-Year, Mainstream 5-Year, and Nursing Home Transition

**Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Characteristics of Residents

Table 23 – Characteristics of Public Housing Residents by Program Type

	Program Type								
				Vouchers					
							Special Purpose Voucher		
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# Homeless at admission	0	11	0	19	0	10	9	0	0
# of Elderly Program Participants (>62)	0	24	0	646	0	638	6	0	0
# of Disabled Families	0	90	0	1,356	0	1,303	28	0	0

	Program Type								
				Vouchers					
							Special Purpose Voucher		
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of Families requesting accessibility features	0	301	0	3,571	0	3,480	52	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0	0

Data Source: PIH Inventory Management System or IMS, formerly PIC (PIH Information Center)
* Includes Non-Elderly Disabled, Mainstream 1-Year, Mainstream 5-Year, and Nursing Home Transition

Race of Residents

Table 24 – Race of Public Housing Residents by Program Type

	Program Type								
				Vouchers					
							Special Purpose Voucher		
Race	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
White	0	235	0	2,823	0	2,740	50	0	0
Black/African American	0	6	0	30	0	29	1	0	0
Asian	0	1	0	16	0	15	0	0	0
American Indian/Alaska Native	0	59	0	696	0	690	1	0	0
Pacific Islander	0	0	0	6	0	6	0	0	0
Other	0	0	0	0	0	0	0	0	0

Data Source: PIH Inventory Management System or IMS, formerly PIC (PIH Information Center)
* Includes Non-Elderly Disabled, Mainstream 1-Year, Mainstream 5-Year, and Nursing Home Transition

**Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Ethnicity of Residents

Table 25 – Ethnicity of Public Housing Residents by Program Type

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Hispanic	0	13	0	122	0	121	1	0	0
Not Hispanic	0	288	0	3,449	0	3,359	51	0	0

Data Source: PIH Inventory Management System or IMS, formerly PIC (PIH Information Center)
* Includes Non-Elderly Disabled, Mainstream 1-Year, Mainstream 5-Year, and Nursing Home Transition

**Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

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

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

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

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

Nevertheless, **Table NA-2** provides the number and percentage of families on the waiting list for Montana's HCV Program. 1,791 families with children, 681 elderly families, and 1,537 families with disabilities are on the waiting list.

Table NA-2 – HCV Waiting List

Applicants on Waiting List	Families with Children		Elderly Families		Families with Disabilities	
	Number	Percent	Number	Percent	Number	Percent
4,694	1,791	38%	681	15%	1,537	33%

Data Source: Commerce (HousingPro – 3/16/21)

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

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

Discussion:

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

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction

In 1986, the Urgent Relief for the Homeless Act was introduced, which chiefly established basic emergency supplies for homeless persons such as food, healthcare, and shelter. The act was later renamed the McKinney-Vento Act after the death of one of its chief legislative sponsors and was signed into law in 1987. This legislation continues to set policy for state and local governments to address homelessness in their jurisdictions.

HUD has historically defined the term "homeless" according to the McKinney-Vento Act, which states that a person is considered homeless if they lack a fixed, regular, and adequate nighttime residence. A person is also considered homeless if they have a primary nighttime residence that is:

- A supervised publicly or privately operated shelter designed to provide temporary living accommodations;
- An institution that provides a temporary residence for individuals intended to be institutionalized; and,
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.[3]

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

Causes of homelessness include job insecurity and job loss; declining household incomes; stagnant wages that force households to live paycheck to paycheck, often one setback away from financial crisis; lack of affordable housing; and loss of health coupled with high medical costs. Other factors, which may cooccur with the causes listed above, are substance use disorder, mental illness, and domestic violence.

In the wake of the ongoing COVID-19 pandemic, more households are at-risk of homelessness, facing one or more of the causes or factors identified herein. Furthermore, a lack of or inadequate systems of support often serve as primers for homelessness, especially for veterans, persons with substance use disorders, persons with severe mental illness, persons with HIV/AIDS, victims of domestic violence, and emancipated youth.

Because of the many and layered causes of homelessness, addressing the needs of the homeless population is an extremely complex endeavor.

Tables 26 and **27** assess the needs of the homeless population in Montana. Because the state uses PIT counts to consider homeless needs, **Table 26** is limited to the number of persons experiencing homelessness on a given night. Because the PIT count does not distinguish between homelessness and rural homelessness, data are not provided for **Table 27**.

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

Homeless Needs Assessment

Table 26 – Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Unsheltered	Sheltered				
Persons in Households with Adult(s) and Child(ren)	54	356	---	---	---	---
Persons in Households with Only Children	0	8	---	---	---	---
Persons in Households with Only Adults	291	648	---	---	---	---
Chronically Homeless Individuals	77	98	---	---	---	---
Chronically Homeless Families	2	10	---	---	---	---
Veterans	69	136	---	---	---	---
Unaccompanied Youth	0	8	---	---	---	---
Persons with HIV	2	2	---	---	---	---

Data Source: 2019 Montana Homeless Survey
Notes: Chronically homeless, HIV, and veteran counts do not include accompanying individuals.

Indicate if the homeless population is [ ] All Rural Homeless [X] Partially Rural Homeless [ ] Has No Rural Homeless

Rural Homeless Needs Assessment

Table 27 – Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Unsheltered	Sheltered				
Persons in Households with Adult(s) and Child(ren)	---	---	---	---	---	---
Persons in Households	---	---	---	---	---	---

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Unsheltered	Sheltered				
with Only Children						
Persons in Households with Only Adults	---	---	---	---	---	---
Chronically Homeless Individuals	---	---	---	---	---	---
Chronically Homeless Families	---	---	---	---	---	---
Veterans	---	---	---	---	---	---
Unaccompanied Youth	---	---	---	---	---	---
Persons with HIV	---	---	---	---	---	---

Data Source: N/A
Notes: N/A

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

Homelessness in Montana has many faces: mothers fleeing domestic violence with their children, veterans sleeping in tents or on sidewalks in need of shelter and supportive services, young students couch surfing or sleeping in vehicles, and transient families without work and with few resources. In rural areas, homelessness is not noticeable in the ways it is in urban areas. Many households experiencing homelessness in rural Montana are doubled up with family or friends or are able to find assistance from a faith-based community organization for days at a time. Yet, they lack a "fixed, regular and adequate nighttime residence." With limited economic opportunities and few resources for navigating factors that contribute to or put households at risk of homelessness (e.g., job loss, substance use, mental illness), many of Montana's poor, rural households have to make the difficult decision to stay and face uncertainty or leave and abandon their communities and social networks.

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

Data necessary to assess the number of Montanans becoming and exiting homelessness each year and the number of days that Montanans experience homelessness are not currently available and it is not feasible to infer an assessment based on existing data.

Nature and Extent of Homelessness (Optional)

HUD released the *2019 Annual Homeless Assessment Report* (AHAR)[4] documenting the national issues related to homelessness. As documented in the AHAR, the nation's homelessness declined (-12.3%) from 2007 to 2019 while Montana's homelessness increased (18.0%). The AHAR highlighted the fact that Montana has the highest rate of unsheltered veterans in the nation (19.0%), and that Montana has experienced the largest increase in the number of chronically homeless individuals nationally, more than doubling at a staggering 134.0%.

The 2019 Montana PIT Homeless Survey counted 1,357 homeless persons, including 410 homeless individuals belonging to a family with children, 8 unaccompanied homeless youth, and 939 homeless adults. Of the 1,357 homeless persons counted, 228 are considered chronically homeless. At the time of the survey, Montana's homeless population was a majority of white persons that were either a household of adults only (69.2%) or a household with adults and children (30.2%). Men represented the majority of respondents (58.4%), while women represented the majority of households with children (77.9%). Additionally, the majority of households were sheltered (74.6%) versus unsheltered (25.4%).

During the 2019 Montana PIT Homeless Survey, in response to the question, "How long has it been since you had a place you considered home or a permanent place to live?" respondents answered as shown in **Table NA-3**.

Table NA-3 – "How long has it been since you had a place you considered home or a permanent place to live?"

Length of Time	Chronically Homeless		Military Veterans		Families with Children	Un-accompanied Youth
	Individuals	Families	Individuals	Families		
1 week or less	N/A	N/A	N/A	N/A	N/A	N/A
Less than 30 days	13	1	29	0	23	1
More than 1 month	2	1	27	0	31	0
More than 3 months	5	0	28	0	25	2
More than 6 months	6	2	28	4	28	2
More than 1 year	38	3	30	0	18	1
More than 2 years	110	5	55	0	10	1
Missing or N/A	1	0	3	0	0	1
Total	175	12	200	4	135	8

Data Source: 2019 Montana Homeless Survey

The nature and extent of homelessness, as evidenced in the 2019 Montana PIT Homeless Survey, is detailed in **Table NA-4**.

[4] https://www.hud.gov/press/press_releases_media_advisories/HUD_No_20_003

Table NA-4 – Nature and Extent of Homelessness

Race/Ethnicity	Sheltered	Unsheltered	Total
White	667	238	905
Black or African American	29	7	36
Asian	4	4	8
American Indian or Alaska Native	175	59	234
Native Hawaiian/Pacific Islander	7	5	12
Other	22	7	29
Two or More Races	108	25	133
Total	1,012	345	1,357
Hispanic	112	28	140
Not Hispanic	900	317	1217

Data Source: 2019 Montana Homeless Survey

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

According to the 2019 Montana PIT Homeless Survey, the number of persons needing shelter or housing assistance in the state on any given day is approximately 1,360 individuals. Households with adults and children accounted for 30.2% of the total homeless population in Montana while veterans (primary respondents only) accounted for 20.3% of Montana's homeless population surveyed for veteran status. Based on data gathered, the estimated number of families with children and the estimated number of veterans in need of housing is 410 and 205, respectively.

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

According to the 2019 PIT Homeless Survey, the majority of homeless persons in Montana are white (66.7%). Individuals describing themselves as American Indian/Alaskan Native represent the second largest percentage of the homeless population (17.2%). Blacks/African Americans make up about 2.7% of homeless persons; Hispanics account for 10.3% while non-Hispanics account for 89.7%. According to 2019 ACS 1-year estimates, American Indian/Alaska Native individuals make up 6% of Montana's population and 5% of Montana's households and Blacks/African Americans make up 1% of Montana's population and less than 1% of Montana's households. The comparison of 2019 PIT and 2019 ACS data shows that American Indians/Alaskan Natives and Blacks/African Americans experience homelessness at a disproportionately higher rate than other racial groups.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Although nearly every county across the state has a homeless population, emergency shelters either do not exist or are often not easily accessible to those residing in more rural counties.

Of the homeless population counted during the 2019 PIT Homeless Survey, 74.6% were sheltered while 25.4% were unsheltered. The majority of homeless persons in Montana, thus, have some form of temporary shelter and have a strong need for supportive services and/or transitional or permanent housing.

Discussion

As discussed earlier, homelessness is experienced when an individual lacks a fixed, regular, and adequate nighttime residence or has a primary nighttime residence under certain circumstances. This definition incorporates many different homeless crises Montanans may face.

Reducing homelessness, especially for veterans and the chronically homeless, is a critical priority in Montana.

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

HUD defines special needs populations as those who are "not homeless but require supportive housing, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with substance use disorders, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify."[5] Because individuals in these groups face unique housing challenges and are vulnerable to becoming homeless, a variety of support services are needed in order for them to achieve and maintain a suitable and stable living environment. Each of these special needs populations will be discussed in terms of their size and characteristics, services and housing currently provided, and services and housing still needed.

The 2020 Housing and Community Development Survey asked participants which special needs populations—including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with substance use disorders, and persons with HIV/AIDS, as well as persons that are homeless or at-risk of homelessness, victims of domestic violence, veterans, and persons recently released from prison—have the highest needs for services and facilities. Two hundred and twenty-nine participants responded, identifying five priority populations each and ranking them from 1 to 5 with 1 being the highest priority. Not considering persons who are homeless or at-risk of homelessness, responses indicate persons with mental illness, the elderly and frail elderly, and veterans have the highest needs for services and facilities (**Appendix B**). Responses also indicate, based on total priority rankings, that persons with mental illness, persons who are homeless or at risk of homelessness, persons with substance use disorders, the elderly, and victims of domestic violence are among the top five priority groups in need of services and facilities (**Table NA-5**).

Table NA-5 – Need for Services and Facilities for Special Needs Populations

	1 (Highest Priority)	2	3	4	5 (Lowest Priority)	Total Priority Rankings 1–5
Persons with mental illness	65	33	34	23	16	171
Persons that are homeless or at-risk of homelessness	31	22	37	16	24	130
Persons with substance use disorders	15	35	27	24	19	120
The elderly (age 65+)	30	29	19	17	22	117
Victims of domestic violence	18	21	23	29	24	115
The frail elderly (age 85+)	36	28	14	19	16	113
Veterans	20	13	21	17	21	92
Persons with physical disabilities	1	20	18	29	21	89
Persons with developmental disabilities	6	12	15	21	33	87
Persons recently released from prison	3	11	13	19	15	61
Other (specify below)*	2	0	0	2	3	7
Persons with HIV/AIDS	0	0	1	1	0	2

Data Source: 2020 Housing and Community Development Survey

[5] Consolidated Plan Final Rule 24 CFR Part 91. U.S. Department of Housing and Urban Development. Community Planning and Development. 1995. 14.

*Other priorities, based on survey responses, include youth (especially homeless youth), transition-age youth (aging out of foster care), and persons in the criminal justice system. Of note, several respondents indicated it was difficult to rank these groups since all are considered highly vulnerable and many factors listed for ranking are co-occurring.

HOPWA

Because the State of Montana's HOPWA funds are provided via competitive award and not through a formula grant, a discussion of HOPWA is not included herein, and HOPWA data are not provided in **Tables 28** and **29**. For information about the State's HOPWA program, funded via competitive award, please see Montana's HOPWA Annual Progress Report.

Table 28 – HOPWA Data

Current HOPWA formula use:	
Cumulative cases of AIDS reported	N/A
Area incidence of AIDS	N/A
Number of new cases prior year (3 years of data)	N/A
Rate per population	N/A
Rate per population (3 years of data)	N/A
Current HIV surveillance data:	N/A
Number of Persons living with HIC (PLWH)	N/A
Area Prevalence (PLWH per population)	N/A
Number of new HIV cases reported last year	N/A

Data Source: CDC HIV Surveillance

HIV Housing Need (HOPWA Grantees Only)

Table 29 – HIV Housing Need

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	N/A
Short-term Rent, Mortgage, and Utility	N/A
Facility Based Housing (Permanent, short-term or transitional)	N/A

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Describe the characteristics of special needs populations in your community:

Elderly and Frail Elderly Persons

HUD defines "elderly" as persons age 62 or older while the Census Bureau defines this segment of the population as persons age 65 or older. Sub-segments of this population include the "extra elderly" (75 and older) and the frail elderly (85 and older). The U.S. National Center for Health Statistics notes that a number of older citizens have limitations caused by chronic conditions that constrain Activities of Daily Living (ADLs). ADLs are divided into three levels, from basic to advanced. Basic ADLs involve personal care and include tasks such as eating, bathing, dressing, using the toilet, and getting in or out of bed or a chair. Intermediate, or instrumental, ADLs are tasks necessary for independent functioning in the community. These include cooking, cleaning, laundry, shopping, using the telephone, using or accessing transportation, taking medicines, and managing money. Social, recreational, and occupational activities that greatly affect the individual's quality of life are advanced ADLs. Playing bridge, bowling, doing

crafts, or volunteering for one's church are examples of advanced ADLs. Persons are considered "frail elderly" if they are unable to perform three or more activities of daily living.[6]

Size and Characteristics

According to 2010 Census, 146,742 residents in the state of Montana were age 65 or older. Per 2018 estimates, 198,902 residents were age 65 or older, a 35.5% change from 2010. **Table NA-6** shows these total counts of the elderly population along with a breakout of smaller age brackets for the group. 2018 estimates indicate that 79,319 persons (39.8%) were extra elderly, or 75 and older, while 22,695 persons (11.4%) were frail elderly, or 85 and older.

According to the State of Montana's Aging Services Unit, by the year 2025 Montana will have the fifth highest per capita older population in the United States.[7] Between 2000 and 2010, the fastest-growing cohort was persons age 55 to 64 followed by persons age 65 and older. Between 2010 and 2017 the fastest-growing cohort was persons age 65 and older, with the cohort age 55 to 64 ranking as the third fastest-growing group. As shown in **Table NA-6**, from 2010 to 2018, the two elderly sub-groups with the greatest growth were age 67 to 69 and 70 to 74, each yielding more than 48.0% increases.

Table NA-6 – Elderly Population by Age

Age	2010 Census		2018 Estimates		% Change
	Population	% of Total	Population	% of Total	
65 to 66	19,811	13.5%	29,134	14.6%	47.1%
67 to 69	26,745	18.2%	39,588	19.9%	48.0%
70 to 74	34,186	23.3%	50,861	25.6%	48.8%
75 to 79	25,637	17.5%	34,678	17.4%	35.3%
80 to 84	20,342	13.9%	21,946	11.0%	7.9%
85 or Older	20,021	13.6%	22,695	11.4%	13.4%
Total	146,742	100.0%	198,902	100.0%	35.5%

Data Source: 2010 Census SF1 Data; 2018 Single-year-of-age Estimates (CDC)

People with Disabilities (Mental, Physical, Developmental)

HUD defines a person with a disability as any person who has a physical or mental impairment that substantially limits one or more major life activities. Physical or mental disabilities include hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS related complex, and mental delay that substantially limits one or more major life activities. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks and caring for oneself.[8] HUD defers to Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 for the definition of developmental disability: a severe, chronic disability of an individual that is attributable to a mental or physical impairment or combination of mental and physical impairments.

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

[6] http://law.justia.com/us/cfr/title24/24-4.0.2.1.12.2.3.2.html
[7] https://dphhs.mt.gov/sltc/aging.aspx
[8] http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/inhousing

Many persons with disabilities live on fixed incomes and thus face financial challenges similar to those faced by the elderly. Furthermore, many persons with disabilities, especially those transitioning from psychiatric hospitals and structured residential programs, benefit from supportive services provided in addition to or in conjunction with affordable, stable housing.

Households affected by mental illness are at increased risk of homelessness. The 2019 PIT Homeless Survey shows that 25.0% of Montana's homeless population had a physical disability while 35.3% had a mental disability.

Size and Characteristics

Data from the 2017 ACS show 138,205 persons with disabilities in Montana, with an overall disability rate of 13.6%. **Table NA-7** presents disabilities by age and gender. The age group with the highest disability rate is persons age 75 and older. Males had a slightly higher disability rate than females at 14.5% and 12.7%, respectively. Children under 5 had the lowest disability rate, at less than 1.0% for both males and females.

Table NA-8 breaks down disabilities by disability type for persons age 5 and older. Per 2017 ACS data, the most common disability is an ambulatory difficulty, followed by a hearing difficulty. The third most common disability is cognitive.

Table NA-7 – Disability by Age and Gender

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	296	0.9%	252	0.8%	548	0.9%
5 to 17	4,834	5.7%	3,249	4.1%	8,083	4.9%
18 to 34	8,979	7.9%	6,349	5.8%	15,328	6.8%
35 to 64	29,059	14.9%	25,922	13.1%	54,981	14.0%
65 to 74	15,409	29.7%	10,895	21.2%	26,304	25.5%
75 or Older	15,122	49.5%	17,839	47.4%	32,961	48.3%
Total	73,699	14.5%	64,506	12.7%	138,205	13.6%

Data Source: 2017 5-Year ACS Data

Table NA-8 – Total Disabilities Tallied

Disability Type	Population
Hearing difficulty	49,510
Vision difficulty	21,844
Cognitive difficulty	47,715
Ambulatory difficulty	66,524
Self-care difficulty	22,363
Independent living difficulty	41,631
Total	249,587

Data Source: 2017 5-Year ACS Data

People with Alcohol or other Drug Addictions

According to the National Coalition for the Homeless, for persons "just one step away from homelessness, the onset or exacerbation of an addictive disorder may provide just the catalyst to plunge them into residential instability."[9] For persons with substance use disorders, housing is complicated. Persons who have stable housing are much better able to treat their addictions. However, obtaining

[9] http://www.nationalhomeless.org/publications/facts/addiction.pdf

stable housing while suffering from addiction can be quite difficult, and the frustrations caused by a lack of housing options may only exacerbate addictions.

Persons with alcohol or other drug addictions (primary respondents only) accounted for 20.8% of Montana's homeless population surveyed for addictions.

Size and Characteristics

DPHHS published the *2018 Montana Prevention Needs Assessment Survey* that was conducted in schools across the state to evaluate adolescent substance abuse.[10] At the time of the survey, within the past 30 days, 28.3% of students reported using alcohol, of which 16.5% reported binge drinking, and 15.0% reported using marijuana. Based on figures reported during the 2016 survey, both alcohol use and marijuana use was up in Montana's 2018 student population. In addition, the Trust for America's Health found that Montana ranked 43rd of all 50 states and the District of Columbia for highest drug overdose mortality rates in the United States in 2018, with 12.2 per 100,000 people suffering drug overdose fatalities.[11] The Trust for America's Health also found that in 2018 Montana's rate of alcohol-related deaths was 17.0 (per 100,000) and Montana's rate of drug-related deaths was 13.0 (per 100,000).[12]

Persons with HIV/AIDS

Studies show that housing assistance enables persons living with HIV/AIDS to achieve housing stability, improve health outcomes, and reduce overall public costs. Housing is also identified as a strategic point of intervention to address HIV/AIDS and overlapping vulnerabilities (such as age, race, mental illness, drug use, or chronic homelessness).

Size and Characteristics

According to information gathered from DPHHS, a total of 749 persons were living with HIV infection in Montana as of January 4, 2021. A total of 1,299 cases of HIV have been reported in Montana, of which 550 persons are known to have died. The HIV Epidemiology Profile for Montana released additional data regarding characteristics of those diagnosed with HIV. Males make up 85% of this population. The largest age group that has received diagnoses were those age 55 and older, accounting for 40%. Non-Hispanic, white persons account for the highest portion of the HIV population at 85%.

The demographic distribution of new HIV diagnoses in Montana during the 2011-2018 period reveals that new cases are not evenly distributed among Montana's counties based on geography, but are evenly distributed among Montana's counties based on population. Yellowstone (26%), Missoula (18%), Cascade (9%), Gallatin (9%) and Flathead (8%) counties accounted for more than 70% of new HIV diagnoses between 2001 and 2018.[13] This is consistent with the counties with the highest population of persons living in Montana and living with HIV.

Persons with HIV/AIDS (primary respondents only) accounted for 0.4% of Montana's homeless population surveyed for HIV/AIDS.

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[10] http://www.bach-harrison.com/mtsocialindicators/ProfileReports.aspx

[11] https://www.tfah.org/article/new-national-data-present-a-mixed-picture-some-drug-overdoses-down-but-others-are-up-and-suicides-rates-are-increasing/

[12] https://www.tfah.org/state-details/montana/

[13] https://dphhs.mt.gov/Portals/85/publichealth/documents/CDEpi/StatisticsandReports/SurveillanceSnapshots/ADAHIVsnapshot2018.pdf

Victims of Domestic Violence

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

Size and Characteristics

Pinpointing a specific number of victims of domestic violence can be difficult because many cases go unreported. However, statistics are available. According to the National Coalition Against Domestic Violence, 1 in 3 or 33% of women and 1 in 4 or 25% of men experience some form of physical violence by an intimate partner. Montana's rates of physical violence by an intimate partner are slightly higher than the national figures, with 39.2% of women and 32.6% of men experiencing intimate partner physical violence in their lifetimes.[16]

According to the 2019 PIT Homeless Survey, there were 1,357 homeless persons in Montana in 2019. Of this count, 257 (18.9%) persons indicated they left home because of domestic violence. Of note, 69.3% of primary respondents and accompanying individuals who cited domestic abuse resulting in homelessness were female. See **Table NA-9** for detailed counts.

Table NA-9 – Homeless Persons who Left Home because of Domestic Violence

Gender	Count of Primary Respondents	Count of Accompanying Individuals	Total Count
Males	26	52	78
Females	129	49	178
Missing or N/A	1	0	1
Total Count	156	101	**257**

Data Source: 2019 Montana Homeless Survey

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

Elderly and Frail Elderly Persons

The Older Americans Act of 1965 has been the main instrument for delivering social services to senior citizens in the United States. This Act established the federal Administration on Aging and related state agencies to specifically address the many needs of the elderly population. Despite limited resources and funding, the mission of the Older Americans Act is broad: "to help older people maintain maximum independence in their homes and communities and to promote a continuum of care for the vulnerable

[14] https://www.justice.gov/ovw/domestic-violence#dv
[15] https://www.ncjrs.gov/pdffiles1/nij/183781.pdf
[16] https://assets.speakcdn.com/assets/2497/montana_2019.pdf

elderly."[17] The Administration on Aging encompasses a variety of services aimed at the elderly population, such as supportive services, nutrition services, family caregiver support, and disease prevention and health promotion.

In Montana, support for the elderly population is provided by the Senior and Long Term Care Division, and the Aging Services Unit, within DPHHS. This state unit administers a wide variety of senior-based services for residents over age 60, with the goal to provide services that allow seniors to remain independent.[18] The unit's programs and services include adult protective services, long term care resources, information and referral services, legal resources, community resources, and financial planning.

The 2019-2022 Montana State Plan on Aging outlines the fundamental concerns facing Montanans as the population continues to age.[19] Montana's State Plan on Aging includes the following goals:

- Goal 1: Improve access to the Older Americans Act services for seniors and their caregivers to provide the supports needed for them to continue to live in their homes and be active in their communities for as long as they choose.
- Goal 2: Improve collaboration with the Title VI Directors and other Tribal members to better facilitate Title III and Title VI coordination and services to all Montana's seniors.
- Goal 3: Improve the dignity, safety, and respect of older adults living in Montana through the Montana Aging Network.

These goals will be achieved by providing quality services through:

- Implementing effective programs for seniors, adults with disabilities, caregivers, and older American Indians in Montana;
- Collaborating with Montana Tribes to improve access to services for reservation communities through Title III and Title VI coordination;
- Obtaining data and conducting comprehensive data analysis to determine the outcomes and areas for improvement in existing programs; and
- Focusing the State Unit of Aging (SUA) involve in future grant funding and initiatives to those that align with core goals and objectives.

Services and Housing Needed for Elderly

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

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

[17] http://www.nhpf.org/library/the-basics/Basics_OlderAmericansAct_02-23-12.pdf
[18] http://www.dphhs.mt.gov/sltc/services/aging/index.shtml
[19] https://dphhs.mt.gov/Portals/85/sltc/documents/AgingReports/MontanaStatePlanonAging2019-2022.pdf

needs of a more independent elderly population. Because most elderly persons are on a fixed income, these increasing costs may fall on publicly funded programs in the state.

Services and Housing Currently Provided for Persons with Disabilities

Under DPHHS's Developmental Services Division, the Developmental Disabilities Program contracts with private, nonprofit corporations to provide services across the lifespan for individuals who have developmental disabilities and their families. The focus of the program is to tailor care to the individual and provide it in as natural an environment as possible.[20] The Montana Development Center (MDC), which closed in 2018 in accordance with a mandate included in Senate Bill 411, was administered by the Developmental Disabilities Program and was the state's only residential facility for individuals with developmental disabilities with 24-hour care for those with the most severe behaviors or severe self-help deficits. Since closure of the MDC, House Bill 387 passed during the 2019 Montana legislative session, addressing the persisting needs of persons with disabilities through the development of the Intensive Behavior Center (IBC), a 12-bed facility that serves as an option for individuals who are not able to be safely served in the community. The IBC is in operation and currently serves adults with autism spectrum disorder in a therapeutic environment.[21]

DPHHS's Addictive and Mental Disorders Division (AMDD) administers mental health services through Medicaid programming, grant funding, the Montana State Hospital, and the Montana Mental Health Nursing Care Center. AMDD supports a continuum of mental health services, including inpatient psychiatric care, community-based habilitation services, community-based rehabilitation services, and crisis response services, all of which seek to provide services to individuals in the least restrictive environment and maintain continuity within their lives and home communities. Inpatient and residential programs, such as behavioral health group homes, adult foster care, crisis stabilization, acute inpatient hospitalization, Montana State Hospital, and Montana Mental Health Nursing Care Center inherently provide temporary shelter to individuals with mental illness on either a short-term or long-term basis. AMDD also implements supportive programming, including tenancy support services, transitional housing funds, supported employment, and wrap-around community-based services that support individuals with mental illness as they receive treatment and seek recovery.

Services and Facilities Needed for Persons with Disabilities

The 2020 Housing and Community Development Survey asked participants which special needs populations have the highest needs for services and facilities. Two hundred and twenty-nine participants responded, identifying five priority groups each and ranking them from 1 to 5 with 1 being the highest priority. Responses indicate the need for services and facilities for persons with disabilities is medium to low, as shown in **Table NA-10**. See **Appendix B** for a more detailed breakout of survey responses.

Table NA-10 – Need for Services and Facilities for Persons with Physical and Developmental Disabilities

	Highest Priority ("1") Ranking	Total Priority (1-5) Ranking
Persons with physical disabilities	11th of 12 (Low Priority)	8th of 12 (Medium Priority)
Persons with developmental disabilities	8th of 12 (Medium Priority)	9th of 12 (Low Priority)

Data Source: 2020 Housing and Community Development Survey

[20] http://www.dphhs.mt.gov/dsd/index.shtml
[21] https://dphhs.mt.gov/dsd/ibc

Individuals with mental illness continue to experience homelessness and housing insecurity at high rates. Mental health providers frequently cite a lack of affordable housing, a lack of housing services, and overall housing instability as a contributing factor to an individual's inability to successfully receive treatment for mental illness. Increased housing services for both housing transitions and housing maintenance, as well as the development of transitional and supportive housing units with integrated mental health services, continue to be needed within Montana.

Services and Housing Currently Provided for Persons with Addictions

AMDD is the designated state adult mental health agency for DPHHS. The mission of AMDD is to implement and improve an appropriate statewide system of prevention, crisis intervention, treatment and recovery for Montanans with mental and substance use disorders.

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

The Montana Chemical Dependency Center, located in Butte, is the only in-patient substance use treatment center administered by the State. It has 16 treatment beds for men, 16 treatment beds for women, 8 detox beds, and 8 stabilization beds.[22]

Services and Housing Needed for Persons with Addictions

According to the Healthy People 2020 national objectives, there were 22 million Americans struggling with a drug or alcohol problem in 2005. Of those with substance abuse problems, 95% are unaware of their problem.[23] Obtaining treatment is a primary concern for many, which often includes high costs and other impacts on the person's ability to obtain or retain an income and housing.

The National Coalition for the Homeless notes that other needs for persons with substance use disorders include transportation and support services, including work programs and therapy access. Barriers also include programs that follow abstinence-only policies. These programs are often unrealistic for persons suffering from addictions because they fail to address the reality of relapses. A person living in supportive housing with an addiction problem who experiences a relapse may suddenly become a homeless person.[24]

The 2020 Housing and Community Development Survey asked participants which special needs populations have the highest needs for services and facilities. Two hundred and twenty-nine participants responded, identifying five priority groups each and ranking them from 1 to 5 with 1 being the highest priority. Responses indicate the need for services and facilities for persons with substance use disorders

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

is medium to high, as shown in **Table NA-11**. See **Appendix B** for a more detailed breakout of survey responses.

Table NA-11 – Need for Services and Facilities for Persons with Substance Use Disorders

	Highest Priority ("1") Ranking	Total Priority (1-5) Ranking
Persons with substance use disorders	7th of 12 (Medium Priority)	3rd of 12 (High Priority)

Data Source: 2020 Housing and Community Development Survey

Services and Housing Currently Provided for Persons with HIV/AIDS

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

- AIDS Drug Assistance Program: This program provides anti-retrovirals, protease inhibitors, hydroxyurea and pentamidine to qualified individuals at no cost.
- Health Insurance Continuum of Coverage Program: This program allows eligible individuals to continue their private health insurance by paying all or part (up to $800) of their monthly premiums.
- HIV Case Management: The goal of the case managers is to deliver comprehensive outpatient health and support services to meet the HIV-related needs of individuals and families with HIV. Seven case management sites in the state serve the governor's five planning regions.[25]

HIV testing and services are provided by numerous public health clinics throughout the state. Free HIV testing is also provided by many nonprofit organizations along with a bevy of other services, such as case management, transitional housing, housing referrals, food pantries, direct financial assistance, support groups and mental health counseling. A partial list of HIV service providers in Montana is provided in **Table NA-12**.

Table NA-12 – HIV Service Providers

Service Organization	Location
RiverStone Health	Billings
District VII HRDC	Billings
Rocky Boy Tribal Health	Box Elder
Bridger Clinic	Bozeman
District 9 HRDC	Bozeman
Browning Tribal Health	Browning
Butte AIDS Support Services	Butte
Dawson County Health Department	Glendive
Hill County Health Department	Havre
Lewis and Clark City-County Health Department	Helena
Flathead City-County Health Department	Kalispell
Central Montana Family Planning	Lewistown
Open AID Alliance	Missoula
Partnership Health Center	Missoula

Data Source: DPHHS

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

Services and Housing Needed for Persons with HIV/AIDS

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

The 2020 Housing and Community Development Survey asked participants which special needs populations have the highest needs for services and facilities. Two hundred and twenty-nine participants responded, identifying five priority groups each and ranking them from 1 to 5 with 1 being the highest priority. Responses indicate the need for services and facilities for persons with HIV/AIDS is low (in relation to other special needs populations), as shown in **Table NA-13**. See **Appendix B** for a more detailed breakout of survey responses.

Table NA-13 – Need for Services and Facilities for Persons with HIV/AIDS

	Highest Priority ("1") Ranking	Total Priority (1-5) Ranking
Persons with HIV/AIDS	12th of 12 (Low Priority)	12th of 12 (Low Priority)

Data Source: 2020 Housing and Community Development Survey

Services and Housing Currently Provided for Victims of Domestic Violence

The Montana Coalition Against Domestic & Sexual Violence is a statewide coalition of individuals and organizations working together to end domestic and sexual violence through advocacy, public education, public policy, and program development. The Coalition's goals are to eliminate all forms of oppression, to provide support, network opportunities and training, and to encourage increased awareness and understanding.[26]

Services for victims of domestic abuse are provided by a variety of nonprofit and faith-based organizations across the state. Many of the shelters have 24-hour crisis lines and offer temporary housing, advocacy, referral programs, counseling, and transportation, as well as many other services. A partial list of domestic violence service providers is shown in **Table NA-14**.

Table NA-14 – Domestic Violence Service Providers

Homeless Service Organization	Counties Served
Rosebud & Treasure County Victim Witness Program	Rosebud, Treasure
Glasgow Police Department – Victim Witness	Valley, Daniels, Sheridan, Phillips
Dawson County Domestic Violence & Sexual Assault Program	Dawson, Wibaux, Prairie
Phillips County Domestic Violence Program	Phillips
Custer Network Against Domestic Abuse & Sexual Assault	Custer, Rosebud, Treasure, Garfield, Powder River
Custer County Attorney's Victim-Witness Assistance	Custer, Carter, Fallon, Powder River, Garfield
Richland County Coalition Against Domestic Violence	Richland, McCone
The Family Violence Resource Center	Fort Peck Reservation
Northeast Montana Victim/Witness Program	Phillips, Valley, Roosevelt, Sheridan, Daniels

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

Homeless Service Organization	Counties Served
7th Judicial District Victim Witness Program	Dawson, Wibaux, Prairie, McCone, Richland
Angela's Piazza: Women's Drop-In Center	Yellowstone
Montana Legal Services Association	Yellowstone, Big Horn, Carbon, Golden Valley, Musselshell, Park, Rosebud, Stillwater, Sweet Grass, Wheatland, Treasure
Billings Area Family Violence Task Force	Yellowstone
Billings City Attorney's Office Domestic Violence Unit	Yellowstone
Yellowstone County Attorney's Office – Victim Witness Office	Yellowstone
YWCA Billings – Gateway	Yellowstone, Carbon, Stillwater, Big Horn, Rosebud, Musselshell
Stillwater County Advocates	Stillwater
Crow Victims Assistance Program	Crow Reservation
Healing Hearts	Northern Cheyenne Reservation
Northern Cheyenne Tribe	Northern Cheyenne Reservation
ASPEN	Meagher, Park, Sweet Grass
Park County Victim Witness Assistance Program	Park
Carbon County Victim-Witness Program	Carbon
Domestic and Sexual Violence Services of Carbon County	Carbon, Stillwater
Montana Legal Services Association	Blaine, Glacier, Hill, Pondera, Liberty, Teton, Toole
Hi-Lines Help for Abused Spouses	Chouteau, Glacier, Toole, Teton, Pondera, Liberty
CASA CAN Children's Advocate Network	Cascade
Family Advocacy	Malmstrom Air Force Base Personnel and Families
YWCA Great Falls	Cascade, Toole, Pondera, Teton, Glacier, Chouteau, Judith Basin, Meagher, Liberty
Victim Impact Program – Pre-release Program	Cascade
Victim-Witness Assistance Program	Cascade, Others as Needed
Voices of Hope	Cascade
Domestic Violence Program/Judicial Court	Fort Belknap Reservation, Blaine
District IV HRDC Domestic Abuse Program	Hill, Blaine, Liberty
Fergus County Attorney Victim Assistance Program	Fergus, Petroleum, Judith Basin
SAVES, Inc.	Fergus, Wheatland, Golden Valley, Musselshell, Garfield, Petroleum, Judith Basin
Musselshell/Golden Valley Victim Witness Assistance Program	Musselshell, Wheatland, Golden Valley
SAVES, Inc. – Satellite Office	Musselshell, Wheatland, Golden Valley
Toole County Victim Advocate Program	Toole
Anaconda Victim Witness Program	Deer Lodge
Jefferson County Victim/Witness Advocate Program	Jefferson
Gallatin County Victim Assistance	Gallatin
HAVEN	Gallatin, Madison, Meagher
Help Center	Gallatin, Madison, Park
MSU Voice Center	Montana State University
Butte Silver Bow County Attorney Victim Witness Advocate Program	Silver Bow
Montana Legal Services Association	Beaverhead, Deer Lodge, Gallatin, Granite, Madison, Powell, Silver Bow
Safe Space, Inc.	Silver Bow, Deer Lodge, Powell, Granite, Jefferson, Madison
Powell County Victim Services	Powell
Women's Resource Center/Community Support Center	Beaverhead, Madison

Homeless Service Organization	Counties Served
City of Helena Victim Services – City Attorney's Office	Lewis & Clark
Friendship Center	Lewis & Clark, Jefferson, Broadwater, Meagher
Montana Legal Services Association	Lewis & Clark, Jefferson, Broadwater, Meagher
YWCA of Helena	Lewis & Clark, Jefferson, Broadwater
Broadwater County Attorney Victim Witness Program	Broadwater
Beaverhead & Madison County Victim/Witness Advocacy Program	Beaverhead, Madison
SAFE	Ravalli
Flathead County Attorney's Office	Flathead
The Abbie Shelter	Flathead
Lincoln County Crisis Solutions	Lincoln
Lincoln County Victim Witness Program	Lincoln
First Step Resource Center – Saint Patrick Hospital	Missoula, Ravalli, Granite, Powell, Sanders, Lake, Flathead Reservation, Any County Requesting Services
Missoula City-County Relationship Violence Services Crime Victim Advocate Services	Missoula
Montana Legal Services Association	Mineral, Missoula, Ravalli, Sanders
Student Advocacy Resource Center	Missoula
YWCA of Missoula	Missoula, Mineral, Sanders, Granite, Lake, Ravalli
CSK Tribal Crime Victim Advocate Program	Flathead Reservation, Lake, Sanders, Missoula
SAFE Harbor	Lake, Flathead Reservation
Granite County Victim-Witness Program	Mineral
Mineral County Crime Victim Advocate Program	Mineral
Mineral County Help Line	Mineral
Sanders County Coalition for Families	Sanders

Data Source: Montana Coalition Against Domestic Violence

Services and Housing Needed for Victims of Domestic Violence

The 2020 Housing and Community Development Survey asked participants which special needs populations have the highest needs for services and facilities. Two hundred and twenty-nine participants responded, identifying five priority groups each and ranking them from 1 to 5 with 1 being the highest priority. Responses indicate the need for services and facilities for victims of domestic violence is medium, as shown in **Table NA-15**. See **Appendix B** for a more detailed breakout of survey responses.

Table NA-15 – Need for Services and Facilities for Victims of Domestic Violence

	Highest Priority ("1") Ranking	Total Priority (1-5) Ranking
Victims of domestic violence	6th of 12 (Medium Priority)	5th of 12 (Medium Priority)

Data Source: 2020 Housing and Community Development Survey

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

According to information gathered from DPHHS, a total of 749 persons were living with HIV infection in Montana as of January 4, 2021. A total of 1,299 cases of HIV have been reported in Montana, of which 550 persons are known to have died. The HIV Epidemiology Profile for Montana released additional data regarding characteristics of those diagnosed with HIV. Males have attributed for 85% of this population. The largest age group that has received diagnoses were those age 55 and older, accounting for 40%. Non-Hispanic, white persons account for the highest portion of the HIV population at 85%.

Discussion

N/A

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction's need for Public Facilities:

The 2020 Housing and Community Development Survey asked participants which community and public facility activities are the highest priority. Two hundred and thirty-three participants responded, identifying five priority activities each and ranking them from 1 to 5 with 1 being the highest priority. Responses indicate childcare facilities, youth centers, and healthcare facilities are the highest priorities (**Appendix B**). Responses also indicate, based on total priority rankings, that childcare facilities, community centers, youth centers, parks and recreational centers, and healthcare facilities are among the top five priority activities needed (**Table NA-16**).

Table NA-16 – Need for Community and Public Facility Activities

Activities	1 (Highest Priority)	2	3	4	5 (Lowest Priority)	Total Priority Rankings 1-5
Childcare facilities	80	40	33	20	18	191
Community centers	21	34	40	38	33	166
Youth centers	29	29	33	37	27	155
Parks and recreational centers	18	31	27	33	39	148
Healthcare facilities	29	35	24	22	13	123
Senior centers	10	21	31	26	24	112
Residential treatment centers	23	21	21	17	16	98
Public buildings with improved accessibility	15	12	12	17	33	89
Other (specify below)*	7	1	2	1	5	16

Data Source: 2020 Montana Housing and Community Development Survey

*Other priorities, based on survey responses, include indoor and outdoor recreation centers, mental health centers, centers for persons with substance use disorders, centers for veterans, centers to support organizations that promote independent living and community-based services as opposed to institutional services, large-scale facilities for large (500+ persons) business and community events, and facilities accessible to persons with disabilities.

How were these needs determined?

These community development needs for the state of Montana were determined based on responses to the 2020 Montana Housing and Community Development Survey and stakeholder input during a focus group discussion.

Describe the jurisdiction's need for Public Improvements:

The 2020 Housing and Community Development Survey asked participants which infrastructure activities are the highest priority. Two hundred and thirty-four participants responded, identifying five priority activities each and ranking them from 1 to 5 with 1 being the highest priority. Responses indicate street and road improvements, water system improvements, and broadband (Internet) expansion are the highest priorities (**Appendix B**). Responses also indicate, based on total priority rankings, that street and road improvements, water system improvements, sidewalk improvements, bicycle and walking paths, and sewer system improvements are among the top five priority activities needed (**Table NA-17**).

Table NA-17 – Need for Infrastructure Activities

Activities	1 (Highest Priority)	2	3	4	5 (Lowest Priority)	Total Priority Rankings 1-5
Street and road improvements	72	40	48	19	16	195
Water system improvements	41	26	24	27	19	137
Sidewalk improvements	12	46	37	23	14	132
Bicycle and walking paths	27	14	24	26	23	114
Sewer system improvements	13	31	22	27	18	111
Broadband (Internet) expansion	30	25	16	16	23	110
ADA (accessibility) improvements	18	15	14	20	23	90
Storm water system improvements	4	8	14	18	19	63
Solid waste facility improvements	1	5	11	9	31	57
Flood drainage improvements	5	9	6	14	10	44
Bridge improvements	7	8	5	15	8	43
Other (specify below)*	2	0	3	2	9	16

Data Source: 2020 Montana Housing and Community Development Survey

*Other priorities, based on survey responses, include expansion of public transportation (especially in rural Montana), infrastructure to promote recycling, infrastructure improvements that are sustainable and environmentally friendly, street and road improvements in rural areas, activities to ensure safe water supply, multi-use paths along highways, cell phone access, traffic system improvements, and integrated water system improvements.

How were these needs determined?

These community development needs for the state of Montana were determined based on responses to the 2020 Montana Housing and Community Development Survey and stakeholder input during a focus group discussion.

Describe the jurisdiction's need for Public Services:

The 2020 Housing and Community Development Survey asked participants which human and public services are the highest priority. Two hundred and thirty-two participants responded, identifying five priority services each and ranking them from 1 to 5 with 1 being the highest priority. Responses indicate mental health and chemical dependency services, childcare services, and transportation services are the highest priorities (**Appendix B**). Responses also indicate, based on total priority rankings, that childcare services, mental health and chemical dependency services, youth services, transportation services, and healthcare services are among the top five priority services needed (**Table NA-18**).

Table NA-18 – Need for Human and Public Services

Services	1 (Highest Priority)	2	3	4	5 (Lowest Priority)	Total Priority Rankings 1-5
Childcare services	44	35	32	26	22	159
Mental health and chemical dependency services	69	34	20	19	15	157
Youth services	21	23	30	39	26	139
Transportation services	23	20	30	31	22	126
Healthcare services	23	29	23	20	25	120

Services	1 (Highest Priority)	2	3	4	5 (Lowest Priority)	Total Priority Rankings 1-5
Senior services	13	23	31	28	23	118
Employment services	12	23	22	14	17	88
Tenant/landlord counseling	5	11	10	12	15	53
Fair housing education and activities	4	7	7	9	16	43
Homebuyer education	6	9	5	12	6	38
Health education and activities (e.g., mitigation of lead-based paint, radon, and asbestos hazards)	6	4	8	5	14	37
Crime awareness education and activities	3	9	7	5	13	37
Other (specify below)*	2	1	0	0	2	5

Data Source: 2020 Montana Housing and Community Development Survey

*Other priorities, based on survey responses, include self-reliance and self-development services, independent living services, tenant and landlord supports, and emergency services.

How were these needs determined?

These community development needs for the state of Montana were determined based on responses to the 2020 Montana Housing and Community Development Survey and stakeholder input during a focus group discussion.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Montana is America's fourth largest state, encompassing more than 147,000 square miles; this equates to 607 square miles more than Maine, South Carolina, West Virginia, Maryland, Hawaii, Massachusetts, Vermont, New Hampshire, and Delaware combined. Montana is also home to seven federally recognized and one state-recognized Tribal Nations that are located across the state. Due to this immense geography, the housing market differs throughout Montana.

According to the Bureau of Business and Economic Research at the University of Montana, affordable housing is an increasingly difficult problem for communities—both large and small—across the state. [27] Their 2020 report, *Affordable Housing in Montana*, concluded that Montana has relatively little affordable housing that are available for low income households, and much of the existing affordable housing inventory is aging and needing rehabilitation. As a result, many low income households are being priced out of housing markets where they cannot afford to rent or buy.

According to the National Low Income Housing Coalition, 32,774 or 24% of renter households in Montana are extremely low income, yet there is a shortage of 17,697 housing units that are available to extremely low income renters. [28] In addition, 89% of extremely low income renters are "cost burdened," meaning that they spend more than 30% of their income on housing costs and utilities, and 68% of extremely low income renters are "extremely cost burdened," meaning that they spend more than 50% of their income on housing costs and utilities. These housing cost burdens extend to very low income and low income renters as well; 62% of very low income renters are "cost burdened" and 17% are "extremely cost burdened," while 24% of low income renters are "cost burdened" and 4% are "extremely cost burdened." Cost burdened households are more like than other renters to sacrifice other necessities like healthy food and healthcare to pay the rent, and to experience unstable housing situations like evictions.

The COVID-19 pandemic has exacerbated issues relating to housing availability and affordability. Many homeowners and renters from more populous states have seen Montana as an advantageous place to be. As a result, the price of homes and apartments for sale have dramatically increased, along with the price of homes and apartments for rent. The housing impacts of the COVID-19 pandemic have outstripped the ability of the market to provide rental rates that low income families, seniors, and individuals with disabilities can afford.

MA-10 Number of Housing Units – 91.310(a)

Introduction

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

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[27] *Affordable Housing in Montana*, Bureau of Business and Economic Research, University of Montana, December 2020. http://www.bber.umt.edu/pubs/econ/AffordableHousing2020.pdf

[28] https://nlihc.org/housing-needs-by-state/montana

All residential properties by number of units

Table 30 – Residential Properties by Unit Number

Property Type	Number	%
1-unit detached structure	347,540	69.4%
1-unit, attached structure	16,978	3.4%
2-4 units	38,416	7.7%
5-19 units	25,215	5.0%
20 or more units	17,290	3.5%
Mobile Home, boat, RV, van, etc.	55,660	11.1%
Total	501,099	100.0%

Data Source: 2017 5-Year ACS Data

Unit Size by Tenure

Table 31 – Unit Size by Tenure

Unit Size	Owners		Renters	
	Number	%	Number	%
No bedroom	1,385	0.5%	7,393	5.4%
1 bedroom	9,303	3.3%	29,209	21.5%
2 bedrooms	59,917	21.1%	51,586	38.0%
3 or more bedrooms	213,563	75.2%	47,619	35.1%
Total	284,168	100.0%	135,807	100.0%

Data Source: 2017 5-Year ACS Data

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

A number of programs help address the housing needs in Montana:

- CDBG,
- HOME,
- HTF,
- Housing Tax Credit Program,
- Multifamily Coal Trust Homes Program
- HCV Program,
- HUD-VASH,
- Section 811 Supportive Housing for Persons with Disabilities,
- Mainstream Voucher Assistance
- Moderate Rehabilitation Program
- ESG and Rapid Re-Housing,
- Native American Housing Assistance and Self-Determination Act Program,
- Section 184 Indian Home Loan Guarantee Program
- U.S. Department of Agriculture Rural Development (USDA-RD),
- Montana Veterans Home Loan Program,
- Montana Housing Loan and Down Payment Assistance Programs, and
- Habitat for Humanity.

CDBG serves income-qualified households of low to moderate income (at or below 80% of AMI) through housing, economic development and community development activities.

HOME serves income-qualified households of low income (at or below 80% AMI) with further targeting of households with very low incomes (at or below 50% AMI) through housing activities. This assistance provides funding for down payment and closing cost assistance for first time homebuyers, acquisition and/or rehabilitation of existing multifamily rental units, new construction of multifamily or single-family housing in partnership with local governments who work with Community Housing Development Organizations (CHDOs) and various nonprofit organizations. Rent and home purchase prices are limited by HUD-issued HOME rents for multifamily properties receiving HOME financing and by HUD-issued purchase price limits for homebuyers receiving HOME down payment and closing cost assistance. Similarly, HUD annually publishes subsidy limits that determine the maximum amount of HOME funds that can be invested in each home assisted by the program. Properties or homebuyer programs that receive HOME assistance are subject to 5- to 20-year periods of affordability during which ongoing compliance with HOME regulations is required.

HTF serves income-qualified household of extremely low income (at or below 30% AMI) through construction or rehabilitation of multifamily properties. Like HOME, HUD determines maximum rents for HTF-assisted units as well as per-unit subsidy that can be provided. Properties that receive HTF assistance are subject to 30-year periods of affordability during which ongoing compliance with HOME regulations is required.

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

Multifamily Coal Trust Homes Programs makes available $15 million of Coal Tax Trust Fund dollars to develop affordable rental homes by providing developers with low-interest rate loans; it is a result of House Bill 16 that was passed during the 2019 legislative session. Multifamily Coal Trust loans can be used for projects such as new construction, acquisition and/or rehabilitation of existing multifamily rental homes, acquisition of land for multifamily rental homes and land trusts, and mobile or manufactured homes. Eligible applicants include non-profits, for-profits, or government entities.

Housing Choice Voucher (HCV) Program provides assistance to income-qualified renters at or below 50% of area median income. Under the HCV Program, a renter finds a suitable home and receives a voucher that pays a rent subsidy equal to the difference between the rent charged by the property owner (with some limitations based on HUD voucher payment standards and HCV program regulations) and 30% of the renter's adjusted gross income. In addition, there is a portfolio of Project Based Section 8 properties in Montana. At those properties, all residents pay 30% of their income toward rent, while HUD pays the remaining portion of the rent to the property owner through a contract managed by MH within Commerce.

Veterans Affairs Supportive Housing Program (HUD-VASH) combines HUD housing vouchers with U.S. Department of Veterans Affairs (VA) supportive services to help veterans who are homeless and their families find and sustain permanent housing. Veterans must be VA health care eligible and meet the McKinney Act definition of homelessness to participate in the program. The VA makes this determination. Income qualifications generally follow the HCV Program, serving income-qualified veteran households at or below 50% of area median income with veterans paying 35% of adjusted gross income for rent.

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

The Mainstream Voucher Assistance helps non-elderly persons with disabilities, allowing participants to connect with supportive services while paying 30% of the household's adjusted gross income for rent. The program is open to persons aged 18-61 with disabilities who meet at least one homeless preference as defined by HUD. Aside from serving a special population, Mainstream vouchers are administered using the same rules as other HCV.

The Moderate Rehabilitation Program provides project-based rental assistance for households with incomes at or below 50% of the area median income. Participants pay 30% of the household's adjusted gross income toward rent. Properties in the Moderate Rehabilitation Program maintain a contract with Commerce that is renewed annually.

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

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

The Section 184 Indian Home Loan Guarantee Program is a home mortgage product specifically designed for American Indian families, tribes, or tribally designated housing entities. With Section 184 financing, borrowers can get into a home with a low down payment and flexible underwriting. Section 184 loans can be used, both on and off native lands, for constructing, rehabilitating, purchasing, or refinancing a home.

The U.S. Department of Agriculture Rural Development (USDA-RD) offers a variety of programs to build or improve housing in rural areas, provide direct loans or loan guarantees to help low- and moderate-

income rural Americans buy safe, affordable housing in rural areas. USDA-RD also offers loans and grants to help rural residents make health and safety repairs to homes. USDA-RD's Multi-Family Housing Programs offer loans to provide affordable rental housing for very low, low-and-moderate income residents, the elderly, and persons with disabilities, as well as rental assistance to help eligible rural residents with their monthly rental costs.

The Montana Veterans' Home Loan Program provides 30-year fixed first mortgage funds to Montana residents who are serving or have served in the military through the federal armed services and the Montana National Guard, for the purchase of their first home. The mortgage interest rate is 1% lower than the Montana Housing regular bond program rate or the Fannie Mae 60-day lock rate, whichever is lower. There is no income or asset limits for qualified Veteran borrowers.

Montana Housing Loan and Down Payment Assistance Programs assist qualified individuals with low-interest loans, down payments, and closing costs, reducing the amount of up-front cash needed to purchase a home. The Regular Bond Program is a 30-year, low-interest rate loan for first-time homebuyers; this program is limited to homebuyers with income and purchase price below the posted limits. The Bond Advantage Down Payment Assistance Program provides up to $10,000 for down payment and closing cost assistance. The MBOH Plus 0% Deferred Down Payment Assistance Program provides up to $6,500 for down payment and closing cost assistance; for this program, the income limit is $55,000. The 80% Combined Program provides homebuyers who are eligible for MH financing with an alternative to an FHA-insured loan, eliminating the need for mortgage insurance. Finally, the Mortgage Credit Certificate is a dollar-for-dollar tax credit that reduces the amount of federal income tax paid by a first-time homebuyer.

Habitat for Humanity has a number of locally run affiliates of Habitat for Humanity International, a nonprofit, housing organization. Habitat for Humanity works in partnership with qualified families to build and renovate decent, affordable housing. The houses then are sold to the families at no profit and with no interest charged. Volunteers provide most of the labor, and individual and corporate donors provide money and materials to build Habitat houses. Partner families themselves invest hundreds of hours of labor—"sweat equity"—into building their homes and the homes of others. Their mortgage payments go into a revolving Fund for Humanity that is used to build more houses.

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

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

In Montana, there are 4,310 apartments with Section 8 contracts that provide critical rental subsidy to residents with very low incomes. In the next 10 years, 44% or 1,896 units have contracts that are set to expire. In addition, there are 1,737 units in Montana with USDA-RD rental assistance, and 20% of those are at risk of losing subsidy within the next 10 years.[29]

[29] *Affordable Housing in Montana*, Bureau of Business and Economic Research, University of Montana, December 2020. http://www.bber.umt.edu/pubs/econ/AffordableHousing2020.pdf

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

Montana has a high demand for renting and owning housing units. This is demonstrated by the 1.4% homeowner vacancy rate and the 6.3% rental vacancy rate, as compared to the national homeowner vacancy rate of 1.0% and the national rental vacancy rate of 6.5%.[30]

Describe the need for specific types of housing:

The 2019 Montana PIT Homeless Survey counted 1,357 homeless persons in Montana. Local governments and private organizations continue to request funds to provide housing for the homeless or those at risk of becoming homeless as well as the need for housing with supportive services or temporary, transitional housing. Montana has high demand for housing is demonstrated by the 1.4% homeowner vacancy rate and 6.3% rental vacancy rate. This compares with the national homeowner vacancy rate of 1.0% and rental vacancy rate of 6.5%. Increasing cost burden, low vacancy rates, and competition for available units underscore the need for more affordable rental and homeownership developments across the state.

Montana will promote equitable, affordable housing by expanding location and energy efficient housing choices for people of all ages, incomes, races, and ethnicities to increase mobility and lower the cost of housing. In addition, Montana will encourage activities to acquire and/or construct new affordable housing to buy or rent in areas where existing investment in infrastructure, facilities, and services leverages multiple economic, environmental, and community objectives.

In 2005, the Census Bureau reported that Montana had 449,791 total housing units. Since that time, the Census Bureau has continued to release estimates of the total number of housing units in the state. The annual estimates of housing stock are presented in **Table MA-1**. By 2019, there were estimated to be 519,935 housing units in Montana.

Table MA-1 – Housing Units Estimates

Year	Housing Units
2005	449,791
2006	458,002
2007	465,868
2008	473,401
2009	479,025
2010	483,006
2011	484,148
2012	484,809
2013	485,771
2014	491,515
2015	494,222
2016	497,749
2017	510,408
2018	515,161
2019	519,935

Data Source: Census Data 2005-2019

[30] https://www.census.gov/housing/hvs/data/rates.html

Type and Tenure

Single-family homes, duplexes, triplexes or fourplexes, apartments, and mobile homes together accounted for over 99.8% of Montana's housing stock in 2015 and 99.9% of Montana's housing stock in 2019. Although this overall proportion did not change considerably between the 4 years, there were some minor changes in the composition of Montana housing stock. The share of housing units accounted for by mobile homes fell by around two percentage points and the share of triplexes, fourplexes, and apartments grew by around a percentage point. By 2017, 72.5% of all housing units in the state were single-family homes, 2.6% were duplexes, 5.2% were triplexes or fourplexes, 9.6% were apartment units, and 9.9% were mobile homes. **Table MA-2** provides additional details of housing units by type.

Table MA-2 – Housing Units by Type

Unit Type	2010 5-Year ACS		2017 5-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	339,245	71.9%	339,245	72.5%
Duplex	16,136	3.4%	16,136	2.6%
Triplex or Fourplex	20,934	4.4%	20,934	5.2%
Apartment	39,894	8.5%	39,894	9.6%
Mobile Home	55,137	11.7%	55,137	9.9%
Boat, RV, Van, Etc.	377	0.1%	377	0.1%
Total	471,723	100.0%	471,723	100.0%

Data Source: 2010 and 2017 5-Year ACS Data

To further explain the types of properties in Montana **Table MA-3** breaks down the structure types of all housing. The majority of housing in Montana are 1-unit detached structures being 69.4% of all structures. The minority of housing in Montana are 1-unit attached structures being 3.4% of all structures.

Table MA-3 – Property Structure Types

Property Type	Number	Percent
1-Unit detached structure	347,540	69.4%
1-Unit attached structure	16,978	3.4%
2-4 units	38,416	7.7%
5-19 units	25,215	5.0%
20 or more units	17,290	3.5%
Mobile Home, boat, RV, van, etc.	55,660	11.1%
Total	501,099	100.0%

Data Source: 2017 5-Year ACS Data

Over 25,000 housing units were added to the Montana housing market between the 2010 Census and 2017 ACS, as seen in **Table MA-4**. Within occupied housing units, the proportion of renter-occupied units grew and the proportion of owner-occupied grew between 2010 and 2017. The number of vacant housing units also increased by 10.8%.

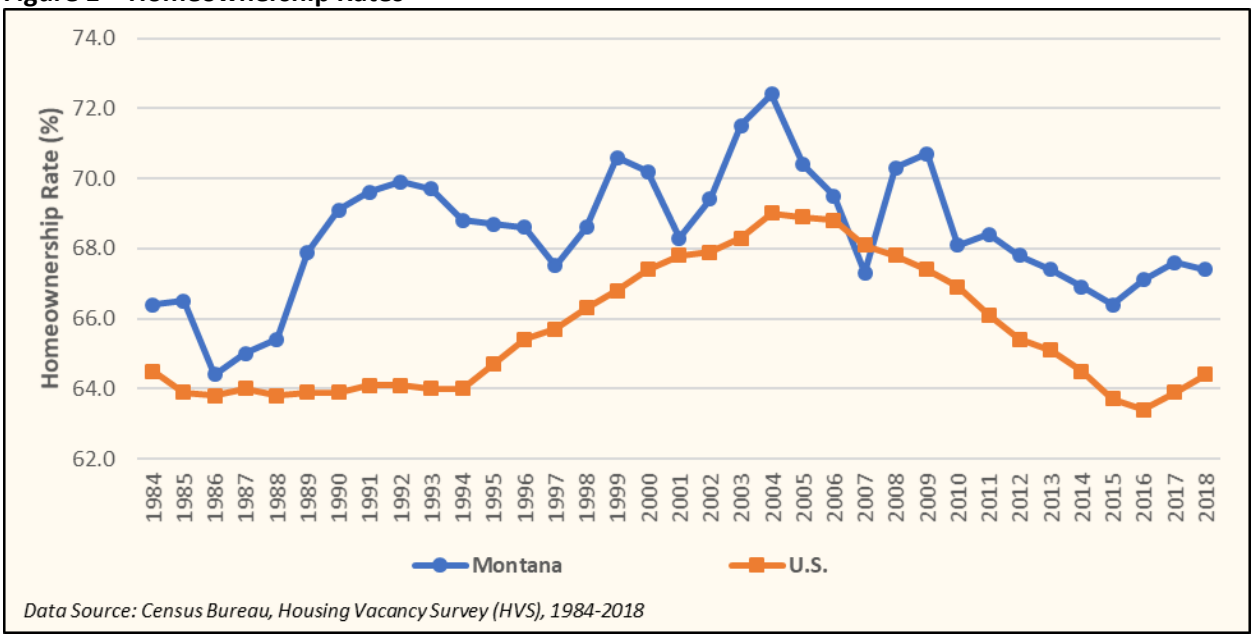
Table MA-4 – Housing Units by Tenure

Tenure	2010 Census		2017 5-Year ACS		% Change
	Units	% of Total	Units	% of Total	
Occupied Housing Units	409,607	84.8%	419,975	83.8%	2.5%
Owner-Occupied	278,418	57.7%	284,168	56.7%	2.1%
Renter-Occupied	131,189	27.2%	135,807	27.1%	3.5%
Vacant Housing Units	73,218	15.2%	81,124	16.2%	10.8%
Total Housing Units	482,825	100.0%	501,099	100.0%	3.8%

Data Source: 2010 Census Data; 2017 5-Year ACS Data

The Census Bureau estimates homeownership rates annually. These data on homeownership rates are presented in **Figure 1**. This figure compares homeownership rates for Montana and the United States from 1986 through 2018 and shows that Montana had consistently higher homeownership rates, with the exception of 2007, over this time as compared to national figures. While homeownership rates are lower in Montana in more recent years than in the mid-1990s and early 2000s, they remain higher than rates in the 1980s.

Figure 1 – Homeownership Rates



Montana Assessor Data

The following section will explore 2019 assessor data for the state of Montana as drawn by the Montana Department of Revenue (DOR) in order to evaluate the condition of housing units throughout the state. According to the2019 ACS, there were 519,935 housing units in the state of Montana. The assessor data is not likely to include housing located on Montana's Tribal Reservations or Reservation Trust Lands, which according to the 2010 Census included 28,220 units. When Tribal housing is included, the total comprises some 548,155 housing units in 2019.

Data presented includes information on structure types, foundations, number of bedrooms, year built, and other characterizing information. It also includes information on the quality of materials and workmanship used in the original construction of the dwellings as demonstrated by grade. This

information provides a holistic look at Montana's housing stock, enabling the State to identify rehabilitation and redevelopment opportunities.

Residential Property Class Dwellings

The following section presents information about the residential property class, including housing characteristics and conditions of the dwellings. According to Montana assessor data, there are a total of 429,724 residential dwelling units in Montana as of 2019. **Table MA-5** shows the residential units by year built. Around 29% of all units were built before 1960, with single-family units comprising 98.8% of these older units. Additionally, the data shows there are 227,369 units that were built before 1980.

Table MA-5 – Residential Dwellings – Construction Era/Year

Year Built	Condominium /Townhouse	Mobile Home	Single-Family	Total
1959 and Earlier	657	768	124,965	126,390
1960-1969	1472	5,632	25,159	32,263
1970-1979	2,664	24,006	42,046	68,716
1980-1989	3,248	9,804	27,254	40,306
1990-1999	4,508	14,018	38,054	56,580
2000-2009	9,915	8,139	48,999	67,053
2010-2017	4,314	3,207	26,553	34,074
2018	707	129	3,497	4,333
2019	0	7	2	9
Total	27,485	65,710	336,529	429,724

Data Source: MT DOR TY 2019

Table MA-6 shows the residential dwellings by number of bedrooms and construction year. The data indicates that three-bedroom dwellings are the most common for all residential dwellings in Montana, accounting for 44.3% of all dwellings. Residential dwellings built in the 1990s and 2000s tended to have three bedrooms, accounting for over half of all dwellings built during those two decades.

Table MA-6 – Residential Dwellings – Number of Bedrooms by Construction Era/Year

Year Built	None/ Studio	1 Bdrms	2 Bdrms	3 Bdrms	4 Bdrms	5 Bdrms	6+ Bdrms	Total
1959 and Earlier	1,451	13,796	43,284	42,215	19,513	4,921	1,210	126,390
1960-1969	370	1,675	8,666	12,993	6,176	2,015	368	32,263
1970-1979	520	2,303	19,003	31,632	11,301	3,359	598	68,716
1980-1989	333	1,909	9,911	19,818	6,450	1,555	330	40,306
1990-1999	404	2,589	9,912	30,098	9,944	2,976	657	56,580
2000-2009	601	3,775	10,778	33,974	12,344	4,405	1,176	67,053
2010-2017	453	2,310	5,655	16,975	5,895	2,146	640	34,074
2018	55	253	722	2,999	707	216	81	5,033
2019	0	0	4	5	0	0	0	9
Total	4,187	28,610	107,935	190,709	72,330	21,593	5,060	430,424

Data Source: MT DOR TY 2019

Table MA-7 confirms that three-bedroom units are the most common for owner-occupied units, while two- bedroom units are the most common for renter-occupied units.

Table MA-7 – Unit Size by Tenure

Bedrooms	Owners		Renters	
	Number	%	Number	%
No Bedrooms	1,385	0.5	7,393	5.4
1-Bedroom	9,303	3.3	29,209	21.5
2-Bedroom	59,917	21.1	51,586	38.0
3+ Bedrooms	213,563	75.2	47,619	35.1
Total	284,168	100	135,807	100

Data Source: MT DOR TY 2019

Residential dwellings are presented by the number of full bathrooms and construction year. **Table MA-8** illustrates that most residential dwellings have one or two full bathrooms, accounting for 38.6% and 45.8% of dwellings, respectively. Newer dwellings, particularly those built after 1980, tended to have two bathrooms over one, as evidenced by the fact that 62.4% of dwellings built in the 1990s, 60.2% of dwellings built in the 2000s, and 62.4% of dwellings built in the 2010s have two full bathrooms. Conversely, older dwellings tended to have fewer bathrooms, with 63.3% of dwellings built prior to 1960 having only one full bathroom.

Table MA-8 – Residential Dwellings – Number of Full Bathrooms by Construction Era/Year

Year Built	None	1 Bath	2 Baths	3 Baths	4 Baths	5 Baths	6+ Baths	Total
1959 and Earlier	4,353	82,033	31,922	3,199	352	54	37	129,456
1960-1969	1,555	16,711	11,737	2,115	120	19	6	32,263
1970-1979	1,112	32,458	28,478	6,250	353	42	23	68,716
1980-1989	713	13,354	21,144	4,585	413	65	32	40,306
1990-1999	664	8,584	35,311	10,670	1,088	187	76	56,580
2000-2009	820	8,220	40,351	14,641	2,266	484	271	67,053
2010-2017	625	4,198	21,256	6,545	988	279	183	34,074
2018	45	503	2,815	778	124	40	28	4,333
2019	0	3	6	0	0	0	0	9
Total	9,887	166,064	196,600	49,545	5,778	1,191	659	429,724

Data Source: MT DOR TY 2019

Similarly, **Table MA-9** presents the number of half bathrooms for each dwelling by construction year. 78.4% of dwellings have no half bathrooms and 20.7% of dwellings have one half bathroom.

Table MA-9 – Residential Dwellings – Number of Half Bathrooms by Construction Era/Year

Year Built	None	1 Bath	2 Bath	3 Bath	4 Bath	5 Bath	6+ Baths	Total
1959 and Earlier	109,688	16,247	429	18	4	4	0	126,390
1960-1969	25,154	6,887	216	5	1	0	0	32,263
1970-1979	52,097	16,105	488	24	1	1	0	68,716
1980-1989	30,861	9,089	338	15	1	1	1	40,306
1990-1999	44,010	12,042	461	49	7	3	8	56,580
2000-2009	47,910	18,125	899	84	18	11	6	67,053
2010-2017	24,426	9,110	469	54	9	4	2	34,074
2018	2,932	1,333	64	3	0	1	0	4,333
2019	9	0	0	0	0	0	0	9
Total	337,087	88,938	3,364	252	41	25	17	429,724

Data Source: MT DOR TY 2019

Table MA-10 presents data on residential dwellings. Data in this table have not been updated since the submission of Montana's previous Consolidated Plan (2015-2019) because more current data are not available.

Table MA-10 demonstrates the total square footage of residential dwellings by construction year and includes basements, first, second, and additional floors, attics and unfinished areas. Most dwellings in Montana, as demonstrated by the data below, are between 1,001 and 2,000 square feet. The data shows that a majority of units with 1,000 square feet or less were built before 1980, with those dwellings accounting for 76.5% of dwellings under 1,000 square feet. Dwellings with 3,000 to 5,000 square feet were most prominent in the 2000s, with dwellings built in the 2000s accounting for 31.3% of dwellings with that square footage.

Table MA-10 – Residential Dwellings – Total Square Feet by Construction Era/Year

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

Data Source: MT DOR 2012

Table MA-11 shows the heated area of residential dwelling by construction date. Much of the data for these residential dwellings is not available. However, of the data that is presented, most dwellings have between 1,001 and 2,000 square feet of heated area.

Table MA-11 – Residential Dwellings – Heated Area by Construction Era/Year

Year Built	1,000 or Less	1,001-2,000	2,001-3,000	3,001-4,000	4,001-5,000	Over 5,000	Data Not Available	Total
1959 and Earlier	8,177	12,315	2,580	524	121	48	102,625	126,390
1960-1969	1,924	3,959	1,349	259	52	16	24,704	32,263
1970-1979	3,675	8,844	3,885	823	158	56	51,275	68,716
1980-1989	1,235	5,236	2,742	797	199	75	30,022	40,306
1990-1999	549	4,711	3,109	1,541	519	381	45,770	56,580
2000-2009	509	3,534	2,759	1,846	935	839	56,631	67,053
2010-2017	189	1,209	868	574	294	347	30,593	34,074
2018	5	49	57	50	29	53	4,090	4,333
2019	0	1	0	0	0	0	8	9
Total	16,263	39,858	17,349	6,414	2,307	1,815	345,718	429,724

Data Source: MT DOR TY 2019

CDU is defined by the Montana Appraisal Manual as a composite rating of the overall condition, desirability, and usefulness (CDU) of a structure. **Table MA-12** presents residential dwellings' CDU by structure type. Most residential dwellings were rated as fair or above. Mobile homes were more

susceptible for low ratings of unsound, very poor or poor, with mobile homes accounting for 31.5% of dwellings with these three ratings, while comprising only 15.3% of all dwellings in this data.

Table MA-12 - Residential Dwellings – Condition (CDU) by Structure Type

Condition (CDU)	Condominium/Townhouse	Mobile Home	Single-Family	Total	Percent of Total
Unsound	805	1,183	2,889	4,877	1.1%
Very Poor	15	1,516	4,438	5,969	1.4%
Poor	89	6,056	10,777	16,922	3.9%
Fair	791	17,959	40,087	58,837	13.7%
Average	7,506	26,056	140,083	173,645	40.4%
Good	11,635	11,125	99,815	122,575	28.5%
Very Good	4,746	1,385	29,747	35,878	8.3%
Excellent	1,898	419	8,693	11,010	2.6%
Total	27,485	65,710	336,529	429,724	100.0%

Data Source: MT DOR TY 2019

Table MA-13 presents data on residential dwellings by building style and structure type. 40.0% of single-family dwellings were classified as conventional, followed by 30.5% of single-family dwellings were classified as ranch.

Table MA-13 – Residential Dwellings – Building Style by Structure Type

Building Style	Condominium/Townhouse	Mobile Home	Single-Family	Total
A-Frame	0	0	728	728
Bi-Level	13	0	13,679	13,692
Bungalow	0	0	9,152	9,152
Condominium	19,632	0	57	19,689
Conventional	94	0	134,844	134,938
Early American	0	0	660	660
Earth Shelter	0	0	393	393
Foursquare	0	0	96	96
Log	4	0	20,329	20,333
Mobile Home	0	65,710		65,710
Modern	0	0	3,781	3,781
Old Style	1	0	32,124	32,125
Other	1	0	4,077	4,078
Ranch	38	0	102,561	102,599
Shotgun	0	0	410	410
Split Level	0	0	12,183	12,183
Townhome	7,702	0	115	7,817
Traditional	0	0	1,340	1,340
Total	27,485	65,710	336,529	429,724

Data Source: MT DOR TY 2019

Table MA-14 shows the foundation type by year built of residential dwellings. 82.2% of dwellings had a concrete foundation. The next most common foundation type was pier, with 7.7% of dwellings. There were 26,281 dwellings that were classified as having no foundation.

Table MA-14 – Residential Dwellings – Year Built by Foundation Type

Year Built	Block	Concrete	None	Other	Pier	Slab	Stone	Wood	Total
1959 and Earlier	1,254	115,904	1,306	91	4,661	1,163	1,745	266	126,390
1960-1969	353	25,693	2,537	10	3,212	398	29	31	32,263
1970-1979	1,023	45,042	10,652	37	11,181	622	39	120	68,716
1980-1989	600	29,392	4,069	27	5,040	787	26	365	40,306
1990-1999	1,145	44,636	4,398	54	4,927	1,136	40	244	56,580
2000-2009	419	59,748	2,152	61	2,351	2,176	23	123	67,053
2010-2017	406	28,806	1,130	43	1,590	2,021	15	63	34,074
2018	17	3,853	36	5	113	307		2	4,333
2019	2	2	1	0	4	0	0	0	9
Total	5,219	353,076	26,281	328	33,079	8,610	1,917	1,214	429,724

Data Source: MT DOR TY 2019

Most dwellings without foundations were mobile homes, as seen in **Table MA-15**, and mobile homes were more likely to have no foundation than other foundation types. The most common foundation type for condominiums/townhouses and single-family dwellings was concrete.

Table MA-15 – Residential Dwellings – Foundation by Structure Type

Foundation Type	Condominium /Townhouse	Mobile Home	Single-Family	Total
Block	35	2,209	2,975	5,219
Concrete	26,028	15,123	311,925	353,076
None	104	24,660	1,517	26,281
Other		132	196	328
Pier	21	23,017	10,041	33,079
Slab	1,279	452	6,879	8,610
Stone	5	7	1,905	1,917
Wood	13	110	1,091	1,214
Total	27,485	65,710	336,529	429,724

Data Source: MT DOR TY 2019

Data was also collected regarding the presence of a basement. This data is presented in **Table MA-16**, by structure type. The data showed that 39.4% of dwellings have a full basement, with single-family homes accounting for 94.2% of dwellings with full basements. It was most common to have no basement, with 44.9% of dwellings having none. Over half of condominiums/townhouses had no basement, and more than nine out of ten mobile homes had no basement.

Table MA-16 – Residential Dwellings – Presence of Basement by Structure Type

Basement Type	Condominium/Townhouse	Mobile Home	Single-Family	Total
None	16,184	60,219	116,348	192,751
Crawl Space	3,187	2,981	23,850	30,018
Partial	554	300	36,703	37,557
Full	7,560	2,210	159,628	169,398
Total	27,485	65,710	336,529	429,724

Data Source: MT DOR TY 2019

Table MA-17 presents data regarding exterior wall construction by structure type. The data indicates that 91.8% of single-family dwellings, and 95.5% of condominiums/townhouses had frame exterior wall construction. The next most common exterior wall construction for single-family dwellings was log, and for condominiums/townhouses is masonry.

Table MA-17 – Residential Dwellings – Exterior Wall Construction by Structure Type

Exterior Wall Construction	Condominium/Townhouse	Mobile Home	Single-Family	Total
Frame	26,250	0	308,772	335,022
Frame and Masonry	605	0	3,673	4,278
Log	135	0	21,132	21,267
Masonry	495	0	2,952	3,447
Mobile Home	0	65,710	0	65,710
Total	27,485	65,710	336,529	429,724

Data Source: MT DOR TY 2019

Table MA-18 depicts residential dwelling grade by structure type. Cheap and poor grades only represent 1.5% of the total dwellings in this data, and single-family dwellings account for 93.9% of dwellings with these two grades. Low cost and fair grades comprise 28.3% of dwellings, and single-family dwellings comprise 77.2% of dwellings with those grades. Mobile homes comprise 21.7% of dwellings with low cost or fair grades, while comprising only 15.3% of the total dwelling units. Condominiums/townhouses were most likely to have an average grade, with 53.0% of condominiums/townhouses having an average grade.

Table MA-18 – Residential Dwellings – Grade by Structure Type

Grade	Condominium/Townhouse	Mobile Home	Single-Family	Total	Percent of Total
Cheap	1	387	1,607	1,995	0.5%
Poor	2		4,445	4,447	1.0%
Low Cost	46	26,382	22,233	48,661	11.3%
Fair	1,326	2	71,610	72,938	17.0%
Average	14,563	24,218	162,968	201,749	46.9%
Good	7,568	14,136	56,013	77,717	18.1%
Very Good	2,567		13,378	15,945	3.7%
Excellent	977	585	2,942	4,504	1.0%
Superior	336		1,091	1,427	0.3%
Extraordinary	99		242	341	0.1%
Total	27,485	65,710	336,529	429,724	100.0%

Data Source: MT DOR TY 2019

Table MA-19 continues the discussion on grade, but by year built. According to this data, dwellings built before 1960 were most likely to have a fair or average grade, with 79.0% of dwellings built prior to 1960 within these grades. Dwellings built since 1980 are most likely to have average or good ratings, with 79.4% of dwelling built after 1980 having an average or good grade.

Table MA-19 – Residential Dwellings – Year Built by Grade

Year Built	Cheap	Poor	Low Cost	Fair	Average	Good	Very Good	Excellent	Superior	Extra-ordinary	Total
1959 and Earlier	1,037	2,818	16,559	48,633	51,238	5,231	744	115	12	3	126,390
1960-1969	216	273	5,991	4,564	18,789	2,203	202	24	1		32,263
1970-1979	253	325	19,265	6,888	34,219	7,033	655	75	3		68,716
1980-1989	135	325	3,623	4,423	22,641	7,704	1,215	213	22	5	40,306
1990-1999	109	277	1,386	3,536	27,824	18,883	3,377	1,007	158	23	56,580
2000-2009	114	237	1,119	3,045	29,633	23,698	6,295	2,025	713	174	67,053
2010-2017	114	178	672	1,693	15,550	11,345	3,012	907	476	127	34,074

Year Built	Cheap	Poor	Low Cost	Fair	Average	Good	Very Good	Excellent	Superior	Extra-ordinary	Total
2018	17	14	46	155	1,854	1,614	445	137	42	9	4,333
2019				1	1	6		1			9
Total	1,995	4,447	48,661	72,938	201,749	77,717	15,945	4,504	1,427	341	429,724

Data Source: MT DOR TY 2019

As seen in **Table MA-20** wood siding/sheathing is the most common exterior wall construction for all dwellings, as well as being the most common for single-family dwellings and second most common condominiums/townhouses. The second most common exterior wall construction for single-family dwellings and most common for condominiums/townhouses was Masonite. The most common exterior wall construction for mobile homes was aluminum/vinyl, followed by wood siding/sheathing.

Table MA-20 – Residential Dwellings – Exterior Wall Construction by Structure Type

Exterior Wall Construction	Condominium/Townhouse	Mobile Home	Single-Family	Total
Asbestos	30	54	10,174	10,258
Aluminum/Vinyl	3,668	34,566	57,865	96,099
Block	169	6	890	1,065
Brick	780	8	6,177	6,965
Masonite	11,785	14,056	83,946	109,787
Other	500	661	24,839	26,000
Shingle	78	56	10,317	10,451
Stone	57	7	680	744
Stucco	836	53	12,350	13,239
Wood Siding/Sheathing	9,582	16,243	129,291	155,116
Total	27,485	65,710	336,529	429,724

Data Source: MT DOR 2012

Roof material is shown in **Table MA-21** by structure type. Asphalt shingles were the most common roof material for all residential dwellings, accounting for 68.3%.

Table MA-21 – Residential Dwellings – Roof Material by Structure Type

Roof Material	Condominium/ Townhouse	Mobile Home	Single-Family	Total
Asbestos	5	168	769	942
Asphalt Shingles	22,749	31,390	239,514	293,653
Composition Roll	262	4,413	8,837	13,512
Copper		9	68	77
Metal	908	29,127	60,252	90,287
Other	598	109	961	1,668
Slate	6	7	220	233
Built up Tar and Gravel	838	267	3,126	4,231
Tile	99	22	1,021	1,142
Wood Shake	1,755	73	9,229	11,057
Wood Shingle	265	125	12,532	12,922
Total	27,485	65,710	336,529	429,724

Data Source: MT DOR TY 2019

Table MA-22 presents effective year by grade for residential dwellings. According to the Montana Appraisal Manual, the effective year is assigned to a structure based upon its condition as of the effective evaluation and may be greater or less than the structure's actual age. The highest number of

dwellings with a grade of cheap or poor had an effective year of 1939 and earlier. The highest number of dwellings with a grade of average and above had an effective year of 2000-2009.

Table MA-22 – Residential Dwellings – Effective Year by Grade

Effective Year	Cheap	Poor	Low Cost	Fair	Average	Good	Very Good	Excellent	Superior	Extra-ordinary	Total
1939 and Earlier	356	585	1,305	886	297	50	5	2			3,486
1940-1949	168	452	1,497	1,490	311	17	1				3,936
1950-1959	262	584	2,882	4,169	2,085	94	13			1	10,090
1960-1969	318	794	8,049	13,669	7,534	420	28	2			30,814
1970-1979	349	814	17,731	8,286	26,134	2,680	178	22	2		66,196
1980-1989	187	463	11,729	9,072	58,714	9,415	962	138	6	3	100,689
1990-1999	118	334	3,504	9,240	48,455	20,803	3,406	862	105	16	86,843
2000-2009	111	232	1,229	4,110	39,121	29,277	7,488	2,229	674	143	84,614
2010 or Later	126	189	735	2,016	19,098	14,961	3,864	1,249	640	178	43,056
Total	1,995	4,447	48,661	72,938	201,749	77,717	15,945	4,504	1,427	341	429,724

Data Source: MT DOR TY 2019

Foundation type by effective year is shown in **Table MA-23**. Concrete foundations were the most likely foundation types for all effective years and accounted for 82.2% of foundation types. The second most common, pier foundations, were most common in dwellings with effective years between 1970 and 1979.

Table MA-23 – Residential Dwellings – Effective Year by Foundation Type

Effective Year	Block	Concrete	None	Other	Pier	Slab	Stone	Wood	Total
1939 and Earlier	28	2,733	143	5	429	36	95	17	3,486
1940-1949	24	3,332	117	5	367	26	53	12	3,936
1950-1959	86	8,464	368	12	897	106	130	27	10,090
1960-1969	239	24,880	1,710	26	3,278	290	298	93	30,814
1970-1979	990	47,905	5,735	51	10,255	727	404	129	66,196
1980-1989	1,256	82,417	7,668	43	7,324	1,053	574	354	100,689
1990-1999	1,414	72,052	5,441	62	5,841	1,437	255	341	86,843
2000-2009	689	74,405	3,824	72	2,881	2,494	81	168	84,614
2010 or Later	493	36,888	1,275	52	1,807	2,441	27	73	43,056
Total	5,219	353,076	26,281	328	33,079	8,610	1,917	1,214	429,724

Data Source: MT DOR TY 2019

Table MA-24 presents data regarding residential dwelling structure type by effective year. The information provided shows dwellings with effective years prior to 1960 were overwhelmingly single-family dwellings. Condominiums/townhouses with effective years in the 2000s were much more prevalent than preceding effective years. Mobile homes were most likely to have effective years in the 1970s-1990s, accounting for 70.0% of all mobile homes.

Table MA-24 – Residential Dwellings – Effective Year by Structure Type

Effective Year	Condominium/Townhouse	Mobile Home	Single-Family	Total
1939 and Earlier	15		3,471	3,486
1940-1949	1	8	3,927	3,936
1950-1959	782	562	8,746	10,090
1960-1969	358	3,901	26,555	30,814
1970-1979	435	16,430	49,331	66,196
1980-1989	3,274	14,975	82,440	100,689
1990-1999	5,342	14,578	66,923	86,843
2000-20019	11,593	10,933	62,088	84,614
2010 or Later	5,685	4,323	33,048	43,056
Total	27,485	65,710	336,529	429,724

Data Source: MT DOR TY 2019

Table MA-25 presents CDU by grade. Looking at this data, dwellings that fall into the categories between cheap and low cost, and between unsound and poor, comprise 18,343 units and represent redevelopment opportunities rather than rehabilitation opportunities; these account for 4.3% of all dwellings. Dwellings that are rated between fair and good and between unsound and poor may be able to be renovated to meet current codes and standards. There are 9,392 dwellings in these categories, accounting for 2.2% of all the dwellings in this data set.

Table MA-25 – Residential Dwellings – Grade by Condition (CDU)

Grade	Unsound	Very Poor	Poor	Fair	Average	Good	Very Good	Excellent	Total
Cheap	551	426	349	318	279	52	16	4	1,995
Poor	602	678	927	1,137	909	165	24	5	4,447
Low Cost	2,108	3,301	9,401	20,465	12,305	953	106	13	48,661
Fair	636	1,206	4,421	20,980	38,191	6,820	602	82	72,938
Average	956	323	1,659	14,571	99,731	70,138	11,066	3,304	201,749
Good	20	24	147	1,213	20,208	37,172	15,397	3,535	77,717
Very Good	3	10	11	84	1,685	5,922	6,275	1,955	15,945
Excellent			7	68	318	1,165	1,851	1,095	4,504
Superior		1		1	16	162	454	793	1,427
Extraordinary	1				3	26	87	224	341
Total	4,877	5,969	16,922	58,837	173,645	122,575	35,878	11,010	429,724

Data Source: MT DOR TY 2019

Discussion

N/A

MA-15 Cost of Housing – 91.310(a)

Introduction

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

Cost of Housing

Table 32 – Cost of Housing

	Base Year: 2010	Most Recent Year: 2017	% Change
Median Home Value	$173,300	$209,100	20.7%
Median Contract Rent	$521	$647	24.2%

Data Source: 2010 5-Year ACS (Base Year); 2017 5-Year ACS (Most Recent Year)

Table 33 – Rent Paid

Rent Paid	Number	%
No cash rent	11,700	8.6%
Less than $500	35,052	25.8%
$500-999	68,019	50.1%
$1,000-1,499	16,463	12.1%
$1,500-1,999	2,759	2.0%
$2,000 or more	1,814	1.3%
Total	135,807	100.0%

Data Source: 2017 5-Year ACS

Housing Affordability

Table 34 – Housing Affordability

% Units Affordable to Households Earning	Renter	Owner
30% HAMFI	11,305	No Data
50% HAMFI	40,040	18,770
80% HAMFI	82,070	55,005
100% HAMFI	No Data	85,550
Total	133,415	159,325

Data Source: HAMFI

Based on the number of households earning 0-30% of the AMI there are not enough rental units in Montana affordable to households earning 30% HAMFI with only 11,305 available (as noted above). What this means is that a small percentage of persons at 30% HAMFI can find units that are affordable. As incomes increase so does the availability of affordable units.

Monthly Rent

Because this Consolidated Plan is for a state grantee and analysis herein considers the entire state of Montana, in which monthly rents vary significantly, monthly rent data are not provided in **Table 35**.

Table 35 – Monthly Rent

Monthly Rent ($)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	N/A	N/A	N/A	N/A	N/A
High HOME Rent	N/A	N/A	N/A	N/A	N/A
Low HOME Rent	N/A	N/A	N/A	N/A	N/A

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

No. Since 2006, the average cost to rent an eligible subsidized housing unit has been increasing while the amount of dollars from HUD has been decreasing. As a result, the number of people that can be assisted by HUD programs in Montana has declined. The poverty rate in Montana has been increasing, with an estimated 139,063 people living at or below the poverty level in Montana in 2018. At an average household size of 2.34 in 2018, this translates into 59,428 households, well beyond the number of households that can be assisted with the available resources.

On the other end of the scale, the median home price in Missoula—one of the nation's least affordable cities, according to a City Lab analysis—is $355,900. While the basic rule of thumb is that an affordable

home is 2.6 times a household annual take-home pay, a Missoula home priced at the median would cost 8.5 years' worth of wages, leaving great demand for affordable housing.

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

Ranked 48th in population density with a population just over 1 million residents living in a state covering more than 147,000 square miles, Montana has a wide range of home values and rents that fluctuate based on a range of local conditions. These conditions include, but are not limited to, declining oil, gas, and coal development in the east, a volatile forest products industry[31] in the west, stagnant grain and livestock prices, and strong housing markets in some areas. These factors converge to decrease the affordability of housing as either home values and/or rents increase or incomes stagnate or even decline. In particular, affordability of housing for individuals with special needs and senior citizens is likely to decrease due to declining levels of assistance and fixed income as living costs increase.

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

According to Census (ACS 2017), Montana's median rent was $647, a comparable amount to Fair Market Rent, except in Montana's most urban cities of Missoula, Billings, and Bozeman. Montana remains committed to assisting local counties and municipalities in finding ways to address the needs of low- and moderate-income households across Montana, including assisting with affordable, accessible rent where that need has been identified.

The Census Bureau also reports the value of construction appearing on a building permit, excluding the cost of land and related land development. As shown in **Figure 2** the construction value of single-family dwellings generally increased from 1980 through 2012. After dropping in 2008, values started to rise again in the past few years. The distribution of housing values around the state of Montana as reported in the 2017 ACS is presented below. **Map 1** shows that the areas with the highest home values were in and near urban areas surrounding Missoula, Bozeman, Kalispell, and Helena. In addition, home values were generally higher in the western portion of the state.

The median home value in Montana has increased since 2000. In 2010, the median home value was $173,300, but in 2017 that same home value has grown to $209,100. This is an increase of 20.7%. **Table MA-26** shows both the median home value and the median contract rent for the state of Montana.

Table MA-27 shows the number of households and their respective rent paid. Approximately 68,019 households paid rent between $500 and $999 a month. 1.3% of households pay more than $2,000 or more a month.

[31] https://missoulian.com/news/local/western-mt-mills-thriving-due-to-sky-high-forest-products-prices/article_9e4d5f49-4231-53f2-9fe2-e7a59dfed1d8.html

Figure 2 – Single-Family Permits and Valuation in Montana

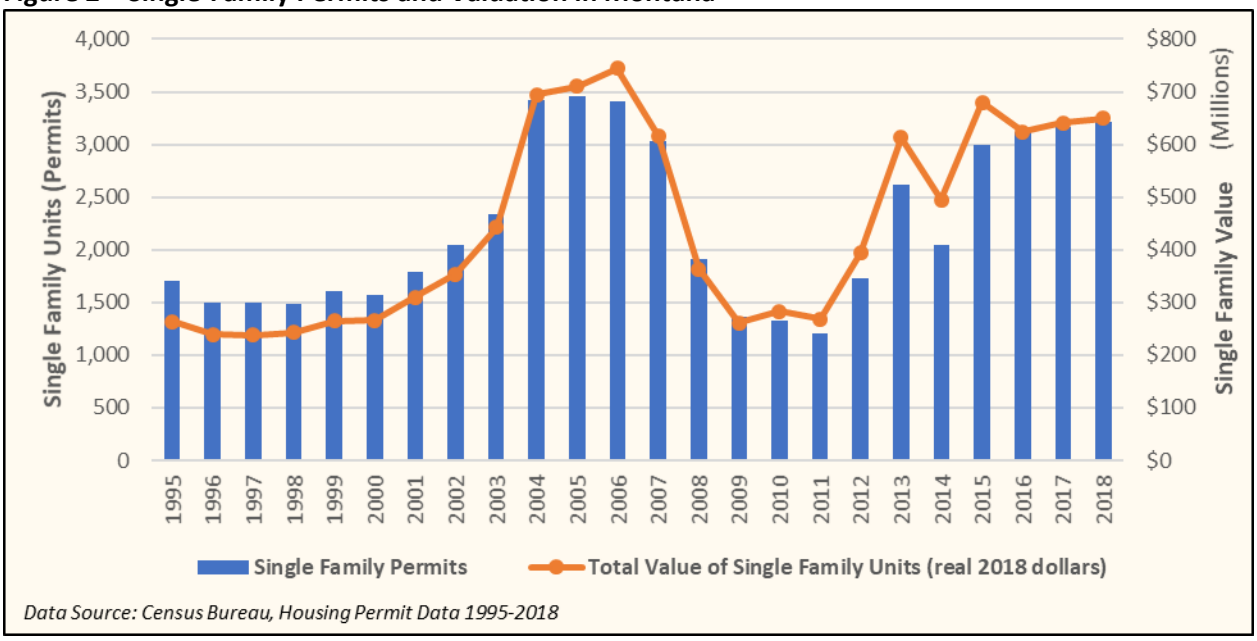


Table MA-26 – Cost of Housing

	Base Year: 2010	Most Recent Year: 2017	Percent Change
Median Home Value	$173,300	$209,100	20.7%
Median Contract Rent	$521	$647	24.2%

Data Source: 2010 5-Year ACS (Base Year); 2017 5-Year ACS (Most Recent Year)

Table MA-27 – Amount of Rent Paid

Rent Paid	Number	Percent
No cash rent	11,700	8.6%
Less Than $500	35,052	25.8%
500-999	68,019	50.1%
$1,000-1,499	16,463	12.1%
$1,500-1,999	2,759	2.0%
$2,000 or more	1,814	1.3%
Total	135,807	100.0%

Data Source: 2007-2011 ACS

Maps 1 and **2**, illustrate data on median gross rent prices by census tract derived from the 2017 ACS. In this situation, gross rent refers to monthly contracted rental fees plus average monthly utility costs, which includes electricity, water and sewer services, and garbage removal. Some similarities can be seen when comparing these maps. For example, the areas with the highest gross rent costs were in or near the major cities in the state and were concentrated in the western half of the state, the majority of the state, however, had average rents between $400 and $500 per month.

As seen in **Table MA-28**, the median rent in 2017 was $647, compared to median rent in 2010 at $521. The median home value in 2017 was $209,100, compared to the median home value in 2010 at $173,300.

Table MA-28 – Median Housing Costs

Housing Cost	Base Year: 2010	Most Recent Year: 2017	% Change
Median Contract Rent	$173,300	$209,100	20.7%
Median Home Value	$521	$647	24.2%

Data Source: 2010 5-Year ACS (Base Year); 2017 5-Year ACS (Most Recent Year)

Table MA-29 presents data on average market rental rates. Data in this table have not been updated since the submission of Montana's previous Consolidated Plan (2015-2019) because more current data are not available.

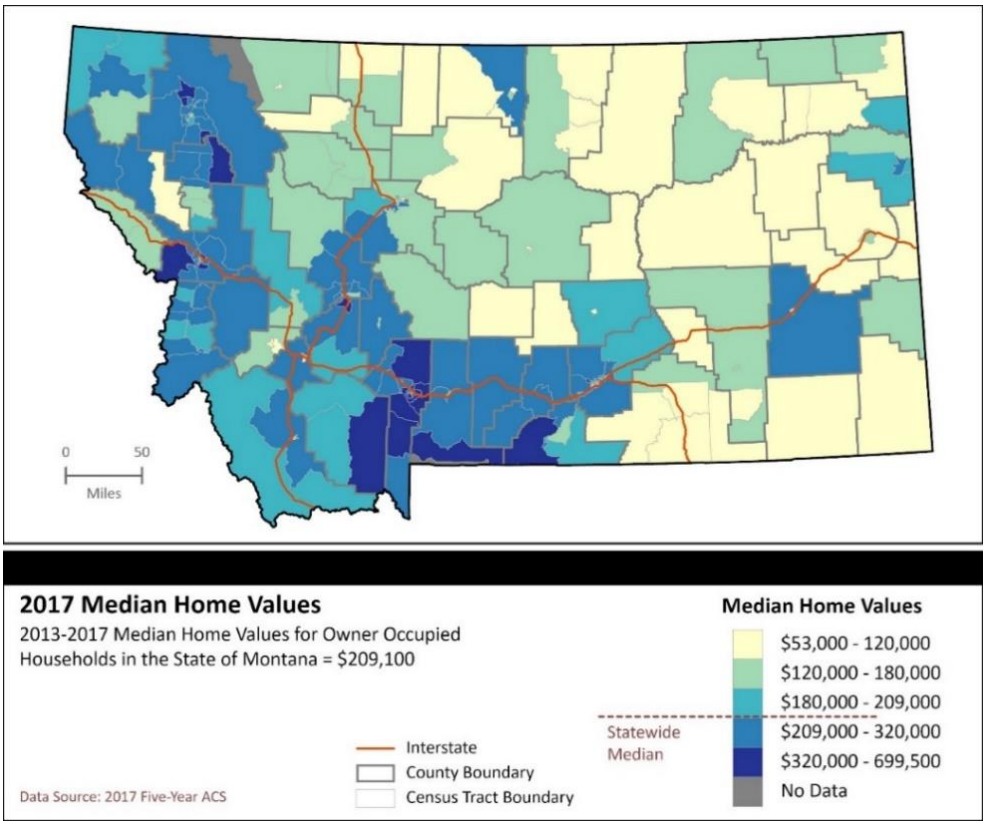
Table MA-29 shows the average market rental rates for the state of Montana. The average rental rate for an efficiency is $510.00, while the average rent for a one-bedroom is $561.60. The total average rent for the state of Montana is $777.20.

Table MA-29 – Average Market Rental Rates

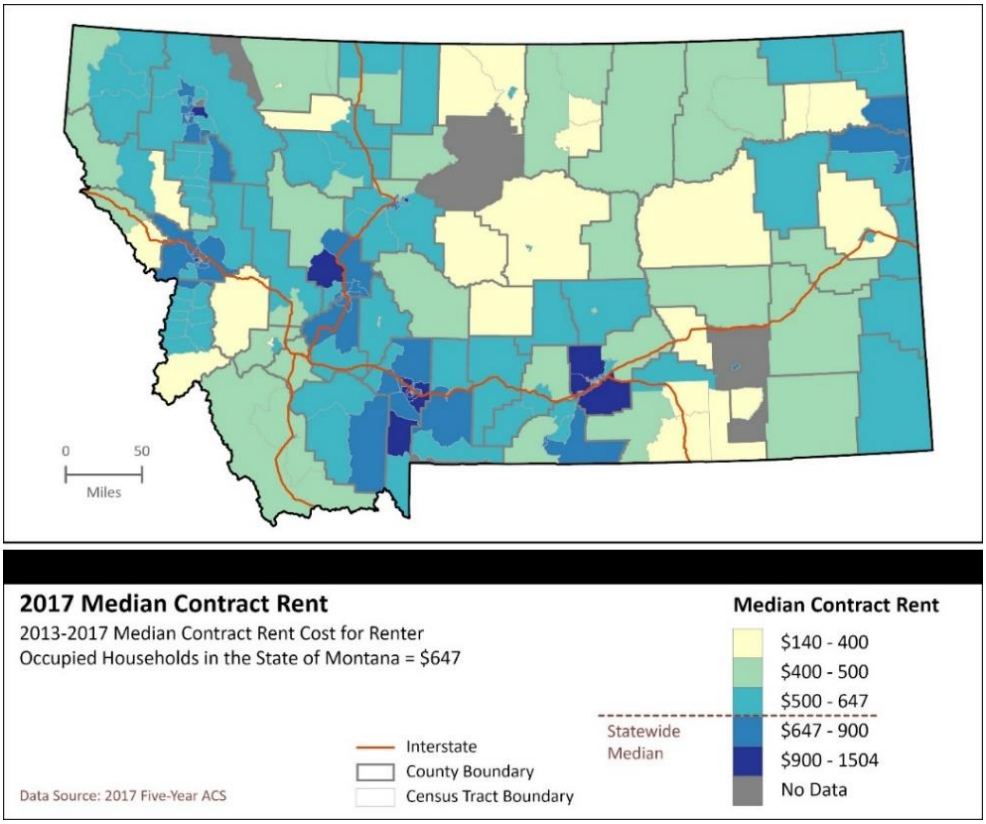
Number of Bedrooms	Single-Family	Apartment	Mobile Homes	"Other"	Average Market Rents
Efficiency	$431.30	$517.10	$	$	$510.00
One	$537.00	$574.60	$400.00	$475.00	$561.60
Two	$726.40	$693.00	$527.40	$636.60	$690.50
Three	$964.10	$901.70	$673.30	$810.50	$905.30
Four	$1,350.80	$1,255.60	$	$1,136.70	$1,327.40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

Data Source: 2014 Montana RVS Survey

Map 1 – Median Home Value by Census Tract



Map 2 – Median Contract Rent by Census Tract



Another indicator of housing cost was provided by the Federal Housing Finance Agency (FHFA). The FHFA, the regulatory agency for Fannie Mae and Freddie Mac, tracks average housing price changes for single-family homes and publishes a Housing Price Index (HPI) reflecting price movements on a quarterly basis. **Figure 3** shows the housing price index for one quarter from each year from 1975 through 2019. As seen therein, the Montana index has been lower than the United States index since the late 1980s, with a near convergence in the mid-1990s. The housing price index in Montana increased for the next 10 years to 12 years, surpassing the national index in 2008. Although the state index fell during that time, it has remained higher than the national level and has begun to rise.

Figure 3 – Housing Price Index, State of Montana vs. United States

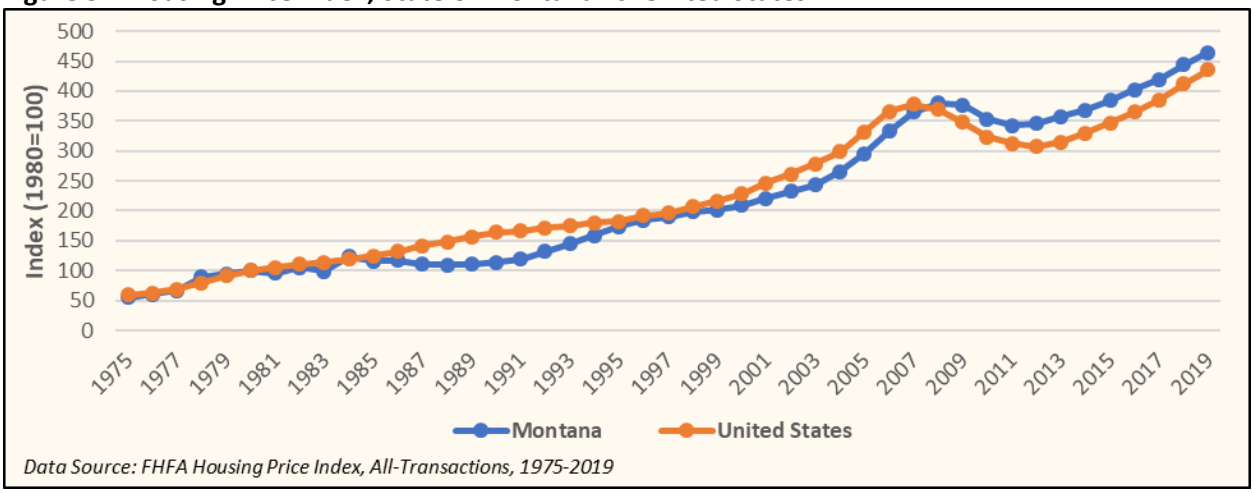


Table MA-30 shows the housing affordability within the state of Montana. There is a total of 82,070 renter households at the 80% HUD Area Median Family Income (HAMFI) versus the 55,005 owner households at the same level.

Table MA-30 – Housing Affordability (Percent of Units Affordable to Households)

Earning	Renter	Owner
30% HAMFI	11,305	No Data
50% HAMFI	40,040	18,770
80% HAMFI	82,070	55,005
100% HAMFI	No Data	85,550
Total	133,415	159,325

Data Source: HAMFI

MA-20 Condition of Housing – 91.310(a)

Introduction:

The condition of housing in the state of Montana has been examined in order to demonstrate the work that is needed over the next 5 years. For Owner-Occupied units, there are 68,747 households, or 25%, which have at least one housing condition. The vast majority of Owner-Occupied units, 207,030 households or 74%, have no selected conditions. For Renter-Occupied units, the balance is similar, with the majority of units (60%) being free of conditions, but 38% having at least one.

The age of the housing stock is also reported in the 2017 ACS. The age of the housing stock has been grouped into nine categories, ranging from 1939 or earlier through 2010 or later. **Table MA-31** shows that substantial numbers of housing units were added to the stock in the 1970s, with those units accounting for 18.6% of the housing stock, and in the 2000s, with those units accounting for 15.0%.

Table MA-31 – Households by Year Home Built

Year Built	2010 Census		2017 5-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	62,150	15.5%	57,740	13.7%
1940 to 1949	23,641	5.9%	20,794	5.0%
1950 to 1959	41,536	10.3%	40,517	9.6%
1960 to 1969	35,846	8.9%	36,425	8.7%
1970 to 1979	80,323	20.0%	78,205	18.6%
1980 to 1989	49,036	12.2%	47,229	11.2%
1990 to 1999	60,384	15.0%	58,311	13.9%
2000 to 2009	48,412	12.1%	63,108	15.0%
2010 or Later			17,646	4.2%
Total	401,328	100.0%	419,975	100.0%

Data Source: 2010 and 2017 5-Year ACS Data

Table MA-32 shows the age of the housing stock in Montana before 1950 through 2018. Between 1950 and 1979, 101,930 owner-occupied houses were added to the housing stock in Montana. During that same timeframe 53,217 renter-occupied houses were added. The table also shows that there is more than double the amount of owner-occupied houses in Montana than renter-occupied.

Table MA-32 – Age of the Housing Stock

Year Unit Built	Owner-Occupied		Renter Occupied	
	Number	%	Number	%
2000 or Later	59,789	21.0%	20,965	15.4%
1980-1999	72,954	25.7%	32,586	24.0%
1950-1979	101,930	35.9%	53,217	39.2%
Before 1950	49,495	17.4%	29,039	21.4%
Total	284,168	100.0%	135,807	100.0%

Data Source: 2017 5-Year ACS

Definitions

Under Section 104(d) of the Housing and Community Development Act of 1974, as amended, housing activities may be completed to replace "occupied" and "vacant but occupiable" low/moderate income dwelling units that are demolished or converted to a use other than as low/moderate income housing as a direct result of funded activities. Section 104(d) provides that dwelling units that meet the definition of "substandard housing unsuitable for rehabilitation," and that have been vacant for at least 6 months prior their conversion or demolition, are exempt from coverage under the plan. For purposes of this plan, Commerce will use the following definitions when considering funding.

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

- Housing Quality Standards (HQS) set forth in the Section 8 Program for HQS
- All zoning ordinances and uniform codes adopted by the state, which are national or international codes

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

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

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

Condition of Units

Table 36 – Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	60,801	21.4%	54,580	40.2%
With two selected Conditions	1,544	0.5%	3,079	2.3%
With three selected Conditions	207	0.1%	234	0.2%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With four selected Conditions	8	0.0%		0.0%
No selected Conditions	221,608	78.0%	77,914	57.4%
Total	284,168	100.0%	135,807	100.0%

Data Source: 2017 5-Year ACS

Year Unit Built

Table 37 – Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	59,789	21.0%	20,965	15.4%
1980-1999	72,954	25.7%	32,586	24.0%
1950-1979	101,930	35.9%	53,217	39.2%
Before 1950	49,495	17.4%	29,039	21.4%
Total	284,168	100.0%	135,807	100.0%

Data Source: 2017 5-Year ACS

Risk of Lead-Based Paint Hazard

Table 38 – Risk of Lead-Based Paint

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	151,425	53.3%	82,256	60.6%
Housing Units build before 1980 with children present	15,925	5.7%	13,790	10.2%

Data Source: 2017 5-Year ACS (Total Units) 2012-2016 CHAS (Units with Children present)

Lead-Based Paint Hazards

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

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

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

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

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

Vacant Units

Information about vacant units suitable or not suitable for rehabilitation throughout the state of Montana is not available; thus, data are not provided in **Table 39**.

Table 39 – Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	N/A	N/A	N/A
Abandoned Vacant Units	N/A	N/A	N/A
REO Properties	N/A	N/A	N/A
Abandoned REO Properties	N/A	N/A	N/A

Need for Owner and Rental Rehabilitation

In Montana, there are 340,153 parcels with housing units on them (a "parcel" could be a complex multifamily building). The ACS 5-year estimates report that Montana has 429,724 housing units. Of that number, according to DOR, 2.6% are in excellent condition; 8.3% are in very good condition; 28.5% are in good condition; 40.4% in average condition; 13.7% are in fair condition; and 3.9% are in poor condition. These last two categories (fair and poor) are candidates for potential rehabilitation and represent more than 75,000 houses across Montana. Clearly there is a need for rehabilitation to retain these houses as part of Montana's housing stock.

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

According to the 2017 5-Year ACS data, 233,681 housing units built before 1980 are at risk of LBP hazards. Data show owner occupied households faced a risk of LBP at all income levels. Renter-occupied households had a higher rate of risk for LBP, with lower income levels facing more LBP risks as documented in 738.

Discussion:

National Efforts to Reduce Lead-Based Paint Hazards

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

[32] "About the Office of Healthy Homes and Lead Hazard Control." 21 February 2011. U.S. Department of Housing and Urban Development. 12 May 2014.

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

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

A 10-year goal was set in February 2000 by President Clinton's Task Force on Environmental Health Risks and Safety Risks to Children to eliminate childhood lead poisoning in the United States as a major public health issue by 2010. To achieve this goal, they released the following four broad recommendations in their "Eliminating Childhood Lead Poisoning: A Federal Strategy Targeting Lead Paint Hazards," report:

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

Continuing these efforts, the U.S. Department of Health and Human Services launched Healthy People 2020, which included the goal of eliminating childhood blood lead levels ≥10 µg/dL (micrograms per deciliter).[35] As part of the National Center for Environmental Health, the program works with other agencies to address the problem of unhealthy and unsafe housing through surveillance, research and comprehensive prevention programs.[36] In 2010, the Environmental Protection Agency enacted the Lead Renovation, Repair, and Painting Rule (RRP). This rule requires that any firms performing renovation, repair, and painting projects that disturb LBP in homes, childcare facilities and pre-schools built before 1978 must be certified by the EPA.[37]

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[33] "Lead Programs Enforcement Division - HUD." Homes and Communities - U.S. Department of Housing and Urban Development (HUD). 12 May.
[34] "Lead: Rules and Regulations; Lead in Paint, Dust, and Soil." U.S. Environmental Protection Agency. 31 Dec. 2008.
[35] http://www.cdc.gov/nceh/Lead/
[36] http://www.cdc.gov/nceh/eehs/
[37] http://www2.epa.gov/lead/renovation-repair-and-painting-program

Lead-Based Paint Hazards for Children

Children's exposure to lead has decreased dramatically over the past few decades due to federal mandates that lead be phased out of items such as gasoline, food and beverage cans, water pipes, and industrial emissions. However, despite a ban in 1978 on the use of lead in new paint, children living in older homes are still at risk from deteriorating LBP and its resulting lead contaminated household dust and soil. Today LBP in older housing remains one of the most common sources of lead exposure for children.[38] Thirty-eight million housing units in the United States had LBP during a 1998 to 2000 survey, down from the 1990 estimate of 64 million. Still, 24 million housing units in the survey contained significant LBP hazards. Of those with hazards, 1.2 million were homes to low-income families with children under 6 years of age.[39]

National Efforts to Reduce Lead Exposure in Children

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

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

Results of National Efforts

All of these coordinated and cooperative efforts at the national, state and local levels have created the infrastructure needed to identify high-risk housing and to prevent and control lead hazards. Consequently, EBLLs in U.S. children have decreased dramatically. For example, in 1978 nearly 14.8 million children in the United States had lead poisoning; however, by the early 90s that number had dropped substantially to 890,000.[42] According to data collected by the CDC, this number is dropping

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[38] "Protect Your Family." March 2014. Environmental Protection Agency. Web. 2 May 2014.

[39] Jacobs, David E., Robert P. Clickner, Joey Y. Zhou, Susan M. Viet, David A. Marker, John W. Rogers, Darryl C. Zeldin, Pamela Broene, and Warren Friedman. "The Prevalence of Lead-Based Paint Hazards in U.S. Housing." Environmental Health Perspectives 110 (2002): A599-606. Pub Med. 12 May 2014. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1241046/pdf/ehp0110-a00599.pdf

[40] "Implementation of the Lead Contamination Control Act of 1988." Editorial. Morbidity and Mortality Weekly Report 01 May 1992: 288-90. 05 Aug. 1998. Centers for Disease Control. 12 May 2014. https://www.cdc.gov/mmwr/preview/mmwrhtml/00016599.htm

[41] Lanphear, MD MPH, Bruce P et al. "Cognitive Deficits Associated with Blood Lead Concentrations" Public Health Reports 115 (2000): 521-29. Pub Med. 12 May 2014. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1308622/pdf/pubhealthrep00019-0027.pdf

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

even more. In 1997, 7.6% of children under 6 tested had lead levels ≥10 µg/dL. By 2012, even after the number of children being tested had grown significantly, only 0.62% had lead levels ≥10 µg/dL.[43]

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

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

Lead-Based Paint Hazards in Montana

Table MA-33 presents the total number of housing units estimated to have LBP risks and shows that a significant number of housing units in the state were at risk of LBP contamination, a total of 223,681 units.

Table MA-33 – Households at Risk of Lead-Based Paint Hazard

Year Built	Households
1939 or Earlier	57,740
1940 to 1949	20,794
1950 to 1959	40,517
1960 to 1969	36,425
1970 to 1979	78,205
1980 to 1989	.
1990 to 1999	.
2000 to 2004	.
2005 or Later	.
Total	223,681

Data Source: 2017 5-Year ACS Data

Table MA-34 presents data regarding the number of households at risk of LBP hazards, broken down by tenure, presence of children age 6 and under, and income. Owner-occupied households showed 15,925 units with young children at risk of LBP exposure, and renter-occupied households showed 13,790 units. In total, 24,078 households showed the capacity to pose LBP health risks for children age 6 or younger.

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

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

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

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

Owner-occupied households faced a risk of LBP at all income levels. Renter-occupied households had a higher rate of risk for LBP, with lower income levels facing more LBP risks.

Table MA-34 - Households at Risk of Lead-Based Paint by Tenure by Income

Income	One or More Children Age 6 or Younger	No Children Age 6 or Younger	Total
Owner Occupied Households			
30% HAMFI or less	1,145	13,380	14,525
30.1-50% HAMFI	1,235	15,460	16,695
50.1-80% HAMFI	2,940	25,365	28,305
80.1% HAMFI or more	2,300	15,425	17,725
100.1% HAMFI and above	8,305	63,665	71,970
Total	15,925	133,295	149,220
Renter Occupied Households			
30% HAMFI or less	3,230	18,600	21,830
30.1-50% HAMFI	3,310	13,940	17,250
50.1-80% HAMFI	3,610	16,175	19,785
80.1% HAMFI or more	1,255	6,665	7,920
100.1% HAMFI and above	2,385	13,765	16,150
Total	13,790	69,145	82,935
Total			
30% HAMFI or less	4,375	31,980	36,355
30.1-50% HAMFI	4,545	29,400	33,945
50.1-80% HAMFI	6,550	41,540	48,090
80.1% HAMFI or more	3,555	22,090	25,645
100.1% HAMFI and above	10,690	77,430	88,120
Total	29,715	202,440	232,155

Data Source: 2012-2016- HUD CHAS Data

Montana Lead Removal Efforts

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

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

Applicants for CDBG, HOME, and HTF funds are made aware of the requirements of the LBP regulations before they apply for funds. If funded, applicants receive additional information on dealing with LBP hazards. Technical assistance is available throughout the project. Commerce also promotes lead training whenever it is offered in Montana.

The State of Montana supports rehabilitation and construction activities to ensure that households, particularly those with children, benefiting from federal housing programs are safe from LBP hazards. Both Commerce and DPHHS provide education and information on LBP hazards to parents, families, healthcare providers, grant recipients, and contractors. Commerce requires that any contractor or subcontractor engaged in renovation, repair, or painting activities is certified and uses lead-safe work practices, as required by the U.S. Environmental Protection Agency. If rehabilitation or homebuyer assistance is funded by CDBG, HOME, or HTF, and the unit funded was built prior to 1980, LBP risks must

be assessed. If a unit has LBP that is chipping, peeling, or deteriorating, it must be remediated or removed during rehabilitation or prior to securing funds for homebuyer assistance. For many projects, CDBG, HOME, and HTF funds can be used to assist with the cost of LBP testing and remediation.

In addition, Uniform Physical Condition Standards (UPCS)/HQS inspections are performed annually at HOME, HTF, Section 8, and other public rental properties throughout the state. UPCS/HQS inspections are also conducted on all homes purchased with HOME assistance prior to the commitment of HOME funds. State staff conducting UPCS inspections complete UPCS training as well as HUD's online Lead-Based Paint Visual Assessment Training.

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

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

For the ESG Program, all units constructed prior to 1978 and assisted with ESG funds must undergo a LBP visual assessment if a child under the age of 6 is or will be living in the unit or a pregnant woman will live in the unit unless an exemption applies. The visual assessment must be completed prior to ESG assistance being provided, and annually thereafter. Depending on the results of the visual assessment, additional steps may be required before assistance can be provided for that unit. In addition, for all households assisted with ESG funds and constructed before 1978, property owners or managers must adhere to disclosure requirements.

Vacant Housing

Table MA-35 shows the change in number of vacant housing units between the 2010 ACS and 2017 ACS. Growth in the vacant housing stock between 2010 and 2017 was driven largely by an increase in the number of units classified as seasonal, accounting for 53.2% of the total vacant housing units. The second disposition group with the most growth over this time period was "other vacant." These units are typically the most problematic, as they are not available to the marketplace. Where such units are grouped in close proximity to each other, a blighting influence may be created. There were 20,583 "other vacant" units in 2017, accounting for 25.4% of all vacant units.

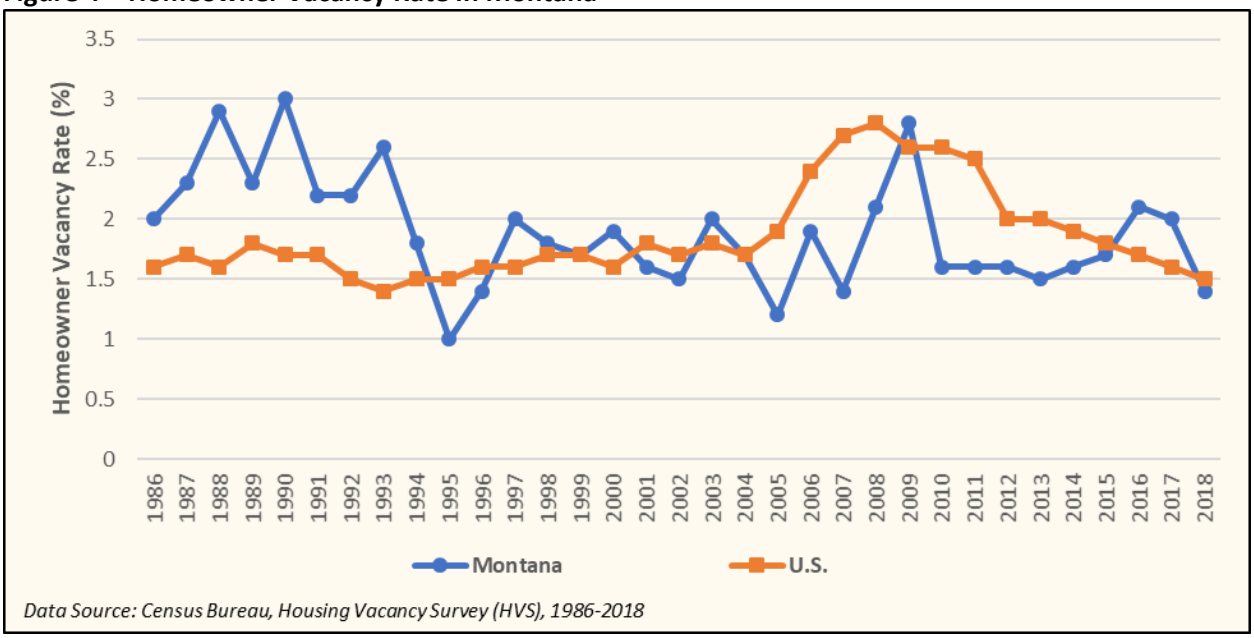
Table MA-35 – Change in Vacant Housing Units

Disposition	2010 5-Year ACS		2017 5-Year ACS		% Change
	Units	% of Total	Units	% of Total	
For rent	7,499	10.7%	8,594	10.6%	14.6%
Rented, not occupied	1,477	2.1%	1,874	2.3%	26.9%
For sale only	4,732	6.7%	4,954	6.1%	4.7%
Sold, not occupied	1,758	2.5%	1,603	2.0%	-8.8%
For seasonal, recreational, or occasional use	34,892	49.6%	43,186	53.2%	23.8%
For migrant workers	304	0.4%	330	0.4%	8.6%
Other vacant	19,733	28.0%	20,583	25.4%	4.3%
Total	70,395	100.0%	81,124	100.0%	15.2%

Data Source: 2010 and 2017 5-Year ACS Data

Census data regarding homeowner vacancy rates, as drawn from the annual surveys conducted by the Census Bureau, were also examined. As shown in **Figure 4**, the homeowner vacancy rate in Montana has fluctuated and crossed the national rate at various times throughout the past 34 years. After spiking in 2009, the homeowner vacancy rate for the state decreased in 2010 and hovered around 1.6%. In 2016, it increased to 2.0% then decreased to 1.5% in 2018.

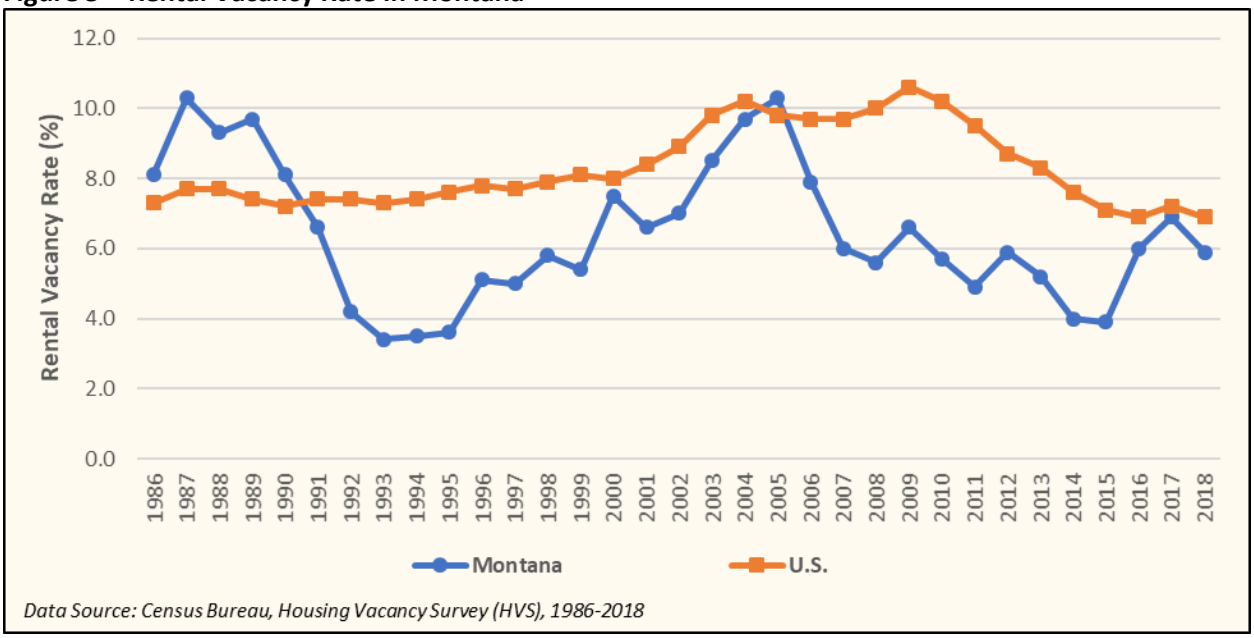
Figure 4 – Homeowner Vacancy Rate in Montana



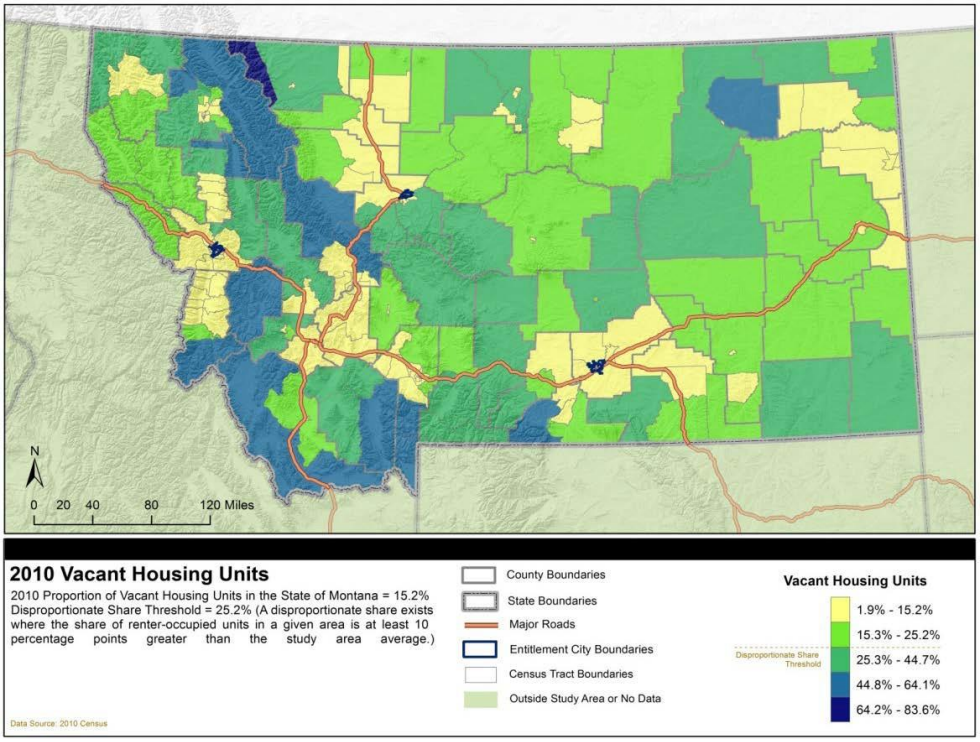
Some of these patterns are reflected in the rental vacancy rates, as shown in **Figure 5**. With the exception of the mid-1980s and one point in 2005, rental vacancy rates in Montana have remained lower than national rates.

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

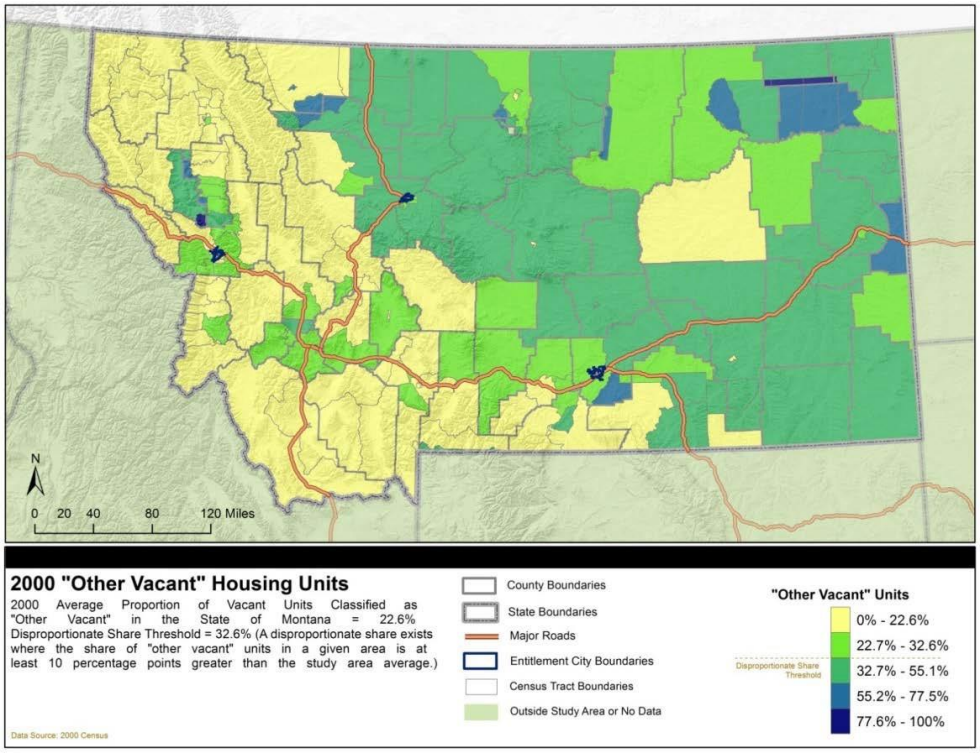
Figure 5 – Rental Vacancy Rate in Montana



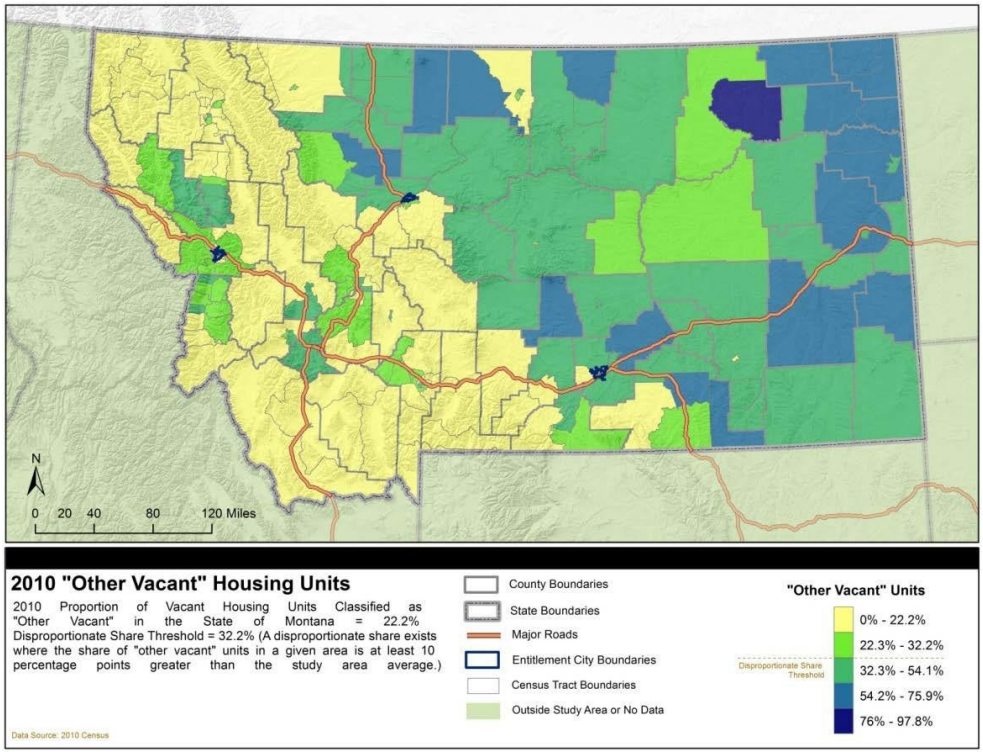
Map 3 – Vacant Housing Units



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



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



MA-25 Public and Assisted Housing – (Optional)

Introduction

Below is information regarding public and assisted housing. **Table 40** shows the number of units in the state by program type.

Totals Number of Units

Table 40 – Total Number of Units by Program Type

Program Type									
				Vouchers					
							Special Purpose Voucher		
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers available	0	292		3,861	0	3,861	364	0	0
# of accessible units									

Data Source: PIC (PIH Information Center)

*Includes Non-Elderly Disabled, Mainstream 1-Year, Mainstream 5-Year, and Nursing Home Transition

Describe the supply of public housing developments:

Montana has 19 PHAs (12 HUD funded PHAs and 7 Tribal PHAs) administering subsidized housing in local communities. There are 400 public housing properties for the elderly and 700 public housing properties for the disabled.

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

There are 12 PHAs and 7 Tribal PHAs in Montana, who own and manage over 5,900 public housing units. These PHAs struggle with aging infrastructure; the cost of completing the capital improvement projects that are necessary to comply with Real Estate Assessment Center (REAC) requirements are difficult within an underfunded capital needs budget.

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

Information on the Restoration and Revitalization Needs of all of Montana's PHAs was not available.

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

As Montana's statewide public housing authority, Commerce does not own or operate any public housing units.

Discussion:

In 2000, the State of Montana had 412,633 total housing units. Since that time, the total housing stock increased each year, reaching 429,724 units in 2018. According to the ACS in 2018, Montana's housing stock included 336,529 single-family units, 27,485 condominiums/townhouse units, and 65,710 mobile

home units. Of the 482,825 housing units counted in Montana in the 2010 census, 409,607 units were occupied, with 278,607 counted as owner-occupied and 131,189 counted as renter occupied. This equated to a homeownership rate of 68%. The Rental Vacancy Survey indicated a vacancy rate throughout the state of 3.7%. The construction value of single-family dwellings generally increased from 1980 through 2018, reaching over $210,000.

MA-30 Homeless Facilities – 91.310(b)

Introduction

DPHHS works with the MTCoC to leverage resources and provide increased and coordinated services to homeless across the state.

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

Facilities Targeted to Homeless Persons

Table 41 – Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current and New)	Voucher / Seasonal / Overflow Beds	Current and New	Current and New	Under Development
Households with Adult(s) and Child(ren)	444	31	223	311	0
Households with Only Adults	517	111	144	630	0
Chronically Homeless Households	0	0	0	245	0
Veterans	12	0	103	572	0
Unaccompanied Youth	0	0	2	3	0

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

Mental Health Center, Billings

a. "The HUB"

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

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

b. Projects for Assistance in Transition from Homelessness (PATH) Program

The PATH Program is part of SAMHSA's Recovery Support Strategic initiative to reduce or eliminate homelessness for individuals with serious mental illness or co-occurring serious mental illness and substance use disorders. Through its required and elective services, the PATH Program links a vulnerable population who experience health disparities to mainstream and other supportive services. Collectively, these efforts help homeless individuals with serious mental illness secure safe and stable housing, improve their health, and live self-directed, purposeful lives.

All individuals who have a serious mental illness, or co-occurring serious mental illness and substance use disorder, and are experiencing homeless or are at imminent risk of becoming homeless are eligible for the PATH Program. In addition, participants in the PATH Program must have been deemed ineligible for commercial or public health insurance programs, have formally determined the insurance unaffordable, or for services not sufficiently covered by insurance.

The PATH Program provides a variety of services. These include: case management, medication management, and prescription renewal within 3-5 days of enrollment; referral to community behavioral health services, including supportive services; referral to primary health services, job training, education services, and housing services; screening and diagnostic treatment services; habilitation and rehabilitation services; community behavioral health services, including support services; primary health services, job training, education services, and housing services; substance use disorder treatment services; and supportive residential services.

Western Montana Mental Health Center, Butte

a. Adult Case Management (ACM)

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

lead/case manager. This program also provides the PATH Program services to the homeless or at-risk population that have mental illnesses. There are 2 adult case managers that are designated to provide these services. This program also provides case management services to veterans under contract with the VA. There are 2 adult case managers that are designated to provide these services as well.

b. Share House

Share House provides residential and an integrated support service for co-occurring or dual disorders (persons who have substance use disorders as well as mental health disorders) and homeless individuals. Share House staff are on site 24 hours a day, 7 days a week. The goal is to have residents become self-sufficient as they progress in their recovery. Share House services are a part of the community effort to end chronic homelessness. Share House provides a drug-free supportive living environment, case management services, life skills groups, rehabilitation aide services related to the development and utilization of life skills, coordinates referral to clinical services, employment, vocational planning, nutritional and medical care, and permanent housing. Supportive housing services are accessed by completing an admission packet and interview. Available slots are based on admission process approval. HUD Supported Housing Share House's residential program has six beds that are designated for homeless individuals who are also chemically dependent.

The Poverello Center, Missoula

a. Healthcare for the Homeless

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

Services include:

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

b. 211/First Call for Help

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

RiverStone Health, Billings

a. Healthcare for the Homeless

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

Lewis and Clark County

a. HealthCare for the Homeless

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

Missoula County

a. Healthcare for the Homeless

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

Montana Office of Public Instruction (OPI)

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

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

God's Love Shelter, Helena

a. Healthcare for the Homeless

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

U.S. Department of Veterans Affairs, Montana Health Care System, Ft. Harrison

a. The Acquired Property Sales for Homeless Providers Program

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

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

b. Health Care for Homeless Veterans (HCHV) Program

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

c. Homeless Patient Aligned Care Teams Program

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

d. Homeless Veterans Dental Program

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

e. Project CHALENG

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

f. Substance Use Disorder Treatment Enhancement Initiative

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

g. The Readjustment Counseling Service's Vet Center Programs

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

Project Homeless Connect Great Falls

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

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

Warming Center, Bozeman

The Warming Center offers seasonal shelter to anyone in need—families with children, single adults and couples are welcome. Separate sleeping areas are provided. Trained staff and volunteers are onsite at all time during operating hours. The Center is open 7:00 PM to 7:00 AM, 7 days per week during the winter months.

HAVEN Battered Woman's Shelter, Bozeman

HAVEN offers alternatives for adults and families who need a place to go when their home is no longer a safe place. HAVEN offers a 15-bed shelter where women and children can escape crisis and plan for a future free from violence. Hotels are reserved and available for male survivors, families with boys age 18 and older, and when the shelter is at capacity. The staff offers comprehensive services including counseling, advocacy and connections to community resources.

Family Promise of Gallatin Valley, Bozeman

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

Montana Rescue Mission, Billings (MRM)

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

a. The Women and Family Shelter

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

b. REACH-Out

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

Butte Rescue Mission, Butte

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

The Poverello Center, Missoula

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

Services include:

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

Union Gospel Mission of Missoula, Missoula

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

a. The Day Center

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

b. The Women & Children's Shelter

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

A Ray of Hope, Kalispell

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

Samaritan House, Kalispell

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

Rescue Mission, Great Falls

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

a. Men's Ministries

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

b. Women and Families Shelter

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

c. Food Ministries

Great Falls Rescue Mission serves three meals a day.

d. Clinic Ministry

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

The Friendship Center, Helena

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

God's Love, Helena

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

YWCA, Helena

a. Women's Shelter

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

b. The Placer Pantry

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

Family Promise of Helena, Helena

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

Good Samaritan, Helena

Good Samaritan Ministries serves as the social justice arm of the Diocese of Helena and Helena's four Catholic parishes. Good Samaritan Ministries, motivated by Catholic social teaching, works in the community to advance family life, human dignity and the common good. They provide services to meet the physical, social, emotional and spiritual needs of individuals and families of all faiths, especially those most in need. The types of assistance provided include: diapers/formula, clothing, household items, furniture, rental assistance, auto repair, utilities/ propane, gasoline, medical prescriptions, eyeglasses, and childcare.

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

St. Vincent dePaul, Billings

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

New Life Mission, Poplar

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

Tumbleweed and Montana Foster Care Independence Program, Yellowstone County

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

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

Valor House, Missoula; Housing MT Heroes

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

Watson's Children's Shelter, Missoula

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

Western Montana Community Mental Health Center, Kalispell

Kalispell Safe House crisis stabilization facility is available to provide a least restrictive level of care in the community when a client is experiencing an acute psychiatric crisis, in imminent risk of psychiatric hospitalization, in need of medication adjustment, and/or in need of 24-hour supervision to maintain safety and avoid hospitalization. Client referrals must be at least 18 years of age and must receive prior authorization from the AMDD or their utilization review contractor, First Health. It is the responsibility of the crisis stabilization staff to facilitate the prior authorization process. Referrals are usually made by a member of the client's treatment team and/or a mental health professional who recommends this level of care. Generally, admissions to crisis facilities are for clients who voluntarily agree to comply with admission criteria and to cooperate with treatment recommendations.

Youth Homes, Missoula

The mission of Youth Homes is to help every youth feel safe, have a sense of belonging and find a place to call home." Youth Homes prepares children with tools for self-reliance because kids aging out of the foster care system without a permanent family are three times more likely to drop out of school and become homeless within 1 year of moving out on their own.

Mountain Home Montana, Missoula

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

Florence Crittenton, Helena

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

Salvation Army Men's Transitional House, Helena

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

Family Promise of Yellowstone Valley

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

The Community Café, Bozeman

The Community Café is part of HRDC's Emergency Food and Nutrition Initiative, striving to improve food security throughout the Gallatin Valley. The Café provides a restaurant style dinner service to anyone who eats regardless of their ability to contribute, operating on a pay what you can model, allowing those who can contribute to pay it forward for others who cannot. In 2014, the Café provided over 50,000 dinners. The Café provides delicious, family-friendly meals 7 days a week from 5:00 PM to 7:00 PM, 365 days a year.

Community Action Partnership of Northwest Montana, Kalispell (CAPNM)

CAPNM partners with the Samaritan House to sponsor the annual Flathead Valley Project Homeless Connect each June. Over 40 local agencies and businesses partner to aid the homeless and impoverished in one convenient location. CAPNM knows that homelessness and poverty are serious needs in Flathead Valley, with approximately 500 people homeless and 45% of those individuals are families with children. Other community needs that Project Homeless Connect addresses are hunger, knowledge of employment and education opportunities, knowledge of affordable housing options, as well as assistance with attaining medical services, dental services and public assistance. The direct services offered at the event are free medical and dental services, financial and employment assistance, pet services, ID services, haircuts, veteran's services, legal assistance, financial education, public assistance, vision services, housing counseling, senior services, bicycle repair, food baskets, etc.

YWCA, Missoula

a. Ada's Place Transitional

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

b. Gateway Assessment Center

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

c. Rapid Re-Housing Program

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

d. Ada's Place Emergency Housing

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

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

The Senior Community Service Employment Program can link senior homeless persons to help with rent, childcare, utilities deposits, transportation, health and dental assistance along with providing employment assistance.

Community action agency education and employment resources

GED

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

Montana Subsidized Employment Program

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

Summer Youth Employment & Training resource

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

Supplemental Nutrition Assistance Program Employment and Training

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

Temporary Assistance for Needy Families (TANF)

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

Youth Employment

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

Montana State Workforce Investment Board - One-Stop Services

All of the workforce programs that are offered in Montana work together to serve all of the targeted populations. A customer that is part of one targeted population, regardless of the specifics, may be served by one or more of the workforce programs. For example, a homeless veteran could be served by Workforce Investment Act Adult, Workforce Investment Act Dislocated Worker, and the veteran program through one or more agencies. Co-enrollment into the various programs with different operators is expected throughout the state to leverage resources for participants.

Other

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

Homeless Special Needs Assessment

Table MA-36 shows the number of facilities and housing targets in Montana. There are currently 351 year-round emergency shelter beds needed for households with adults and children, and 395 year-round emergency shelter beds needed for households with only adults.

Table MA-36 – Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Needs		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current and New)	Voucher/Seasonal/ Overflow Beds	Current and New	Current and New	Under Development
Households with Adult(s) and Child(ren)	444	31	223	311	0
Households with Only Adults	517	111	144	630	0
Chronically Homeless Households	0	0	0	245	0

	Emergency Shelter Needs		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current and New)	Voucher/Seasonal/ Overflow Beds	Current and New	Current and New	Under Development
Veterans	12	0	103	5	0
Unaccompanied Youth	0	0	2	3	0

Data Source: DPHHS

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

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

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

HOPWA Assistance Baseline Table

Because the State of Montana's HOPWA funds are provided via competitive award and not through a formula grant, a discussion of HOPWA is not included herein, and HOPWA data are not provided in **Table 42**. For information about the State's HOPWA program, funded via competitive award, please see Montana's HOPWA Annual Progress Report.

Table 42 – HOPWA Assistance Baseline

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	N/A
PH in Facilities	N/A
STRMU	N/A
ST or TH Facilities	N/A
PH Placement	N/A

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

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

DPHHS works with the MTCoC to leverage resources and provide increased and coordinated services across the state.

Activities include rental assistance, financial assistance of rental application fees, security and utility deposits and payments, case management, housing search and support for toll free telephone referral hotlines for domestic abuse and other homeless individuals and families, referral to mainstream

resources, and assistance to shelters for the homeless and victims of domestic and sexual violence, youth homes, and food banks.

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

As discussed in PR-10, Commerce and DPHHS, with other key partners, are working collaboratively to address housing and healthcare needs in Montana, through the IAP, Mainstream Voucher Program, and IHIP.

The Mental Health Oversight Advisory Council works to create a mental health system that effectively serves families and individuals throughout Montana, including programs for housing, employment, education, and socialization.

Funds for transitional housing, permanent supportive housing, and rapid rehousing across Montana are available on a competitive basis through the MTCoC process. Each of the 12 regional MTCoC districts, housed within 9 of the state's 10 HRDCs, provides specific services of crisis stabilization and housing supports for veterans, unaccompanied youth, families with children, and chronically homeless individuals and families.

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

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

The State of Montana will work to encourage activities that address the housing needs of those at risk of homelessness, encourage activities that increase the level of assistance to programs serving those at risk of homelessness, and encourage the development and rehabilitation of non-rental facilities for the shelter and transition of temporarily homeless Montanans.

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

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

N/A

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Non-homeless special needs populations in the state include the elderly and frail elderly, persons living with disabilities, persons with substance use disorders, victims of domestic violence, and persons living with HIV and their families. These populations are not homeless, but are at the risk of becoming homeless and therefore often require housing and service programs. The 2020 Housing and Community

Development Needs Survey indicated the highest need for persons with mental illness, followed by persons that are homeless and persons with substance use disorders.

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

The 2020 Housing and Community Development Survey asked participants which special needs populations have the highest needs for services and facilities. Two hundred and twenty-nine participants responded, identifying five priority populations each and ranking them from 1 to 5 with 1 being the highest priority. Responses indicate persons with mental illness, the elderly and frail elderly, persons that are homeless or at-risk of homelessness, and veterans have the highest needs for services and facilities (**Appendix B**). Responses also indicate, based on total priority rankings, that persons with mental illness, persons that are homeless or at-risk of homelessness, persons with substance use disorders, the elderly, and victims of domestic violence are among the top five priority groups in need of services and facilities (**Table MA-37**).

Table MA-37 – Need for Services and Facilities for Special Needs Populations

	1 (Highest Priority)	2	3	4	5 (Lowest Priority)	Total Priority Rankings 1-5
Persons with mental illness	65	33	34	23	16	171
Persons that are homeless or at-risk of homelessness	31	22	37	16	24	130
Persons with substance use disorders	15	35	27	24	19	120
The elderly (age 65+)	30	29	19	17	22	117
Victims of domestic violence	18	21	23	29	24	115
The frail elderly (age 85+)	36	28	14	19	16	113
Veterans	20	13	21	17	21	92
Persons with physical disabilities	1	20	18	29	21	89
Persons with developmental disabilities	6	12	15	21	33	87
Persons recently released from prison	3	11	13	19	15	61
Other (specify below)*	2	0	0	2	3	7
Persons with HIV/AIDS	0	0	1	1	0	2

Data Source: 2020 Housing and Community Development Survey

*Other priorities, based on survey responses, include youth (especially homeless youth), transition-age youth (aging out of foster care), and persons in the criminal justice system. Of note, several respondents indicated it was difficult to rank these groups since all are considered highly vulnerable and many factors listed for ranking are co-occurring.

Elderly and Frail Elderly Persons

HUD provides a definition of "elderly" as persons age 62 or older. The U.S. National Center for Health Statistics notes that a number of older citizens have limitations caused by chronic conditions that constrain ADLs. ADLs are divided into three levels, from basic to advanced. Basic ADLs involve personal care and include tasks such as eating, bathing, dressing, using the toilet, and getting in or out of bed or a chair. Intermediate, or instrumental, ADLs are tasks necessary for independent functioning in the community. These include cooking, cleaning, laundry, shopping, using the telephone, using or accessing transportation, taking medicines, and managing money. Social, recreational and occupational activities that greatly affect the individual's quality of life are Advanced Activities of Daily Living (AADL). Playing bridge, bowling, doing crafts, or volunteering for one's church are examples of advanced ADLs. "Frail elderly" is defined as persons who are unable to perform three or more activities of daily living.[47]

Size and Characteristics

According to 2018 CDC data, 198,902 residents in the State of Montana were age 65 or older, which equated to about 18.6% of the total population. **Table MA-38** presents a breakdown of the elderly population by age in Montana in 2018. While elderly is defined as persons over 62, "extra elderly" persons are those over the age of 75. Within the elderly population in Montana, 39.8% were extra elderly. According to the State of Montana's Aging Services Unit, by the year 2025 Montana will have the fifth highest per capita older population in the United States.[48] The elderly population in Montana grew 35.5% between 2010 and 2018. The two age groups with the greatest growth over this decade were those ages 70 to 74, with 48.8% growth, and those aged 67 to 69, with 48.0% growth.

Table MA-38 – Elderly Population by Age

Age	2010 Census		2018 Estimates		% Change
	Population	% of Total	Population	% of Total	
65 to 66	19,811	13.5%	29,134	14.6%	47.1%
67 to 69	26,745	18.2%	39,588	19.9%	48.0%
70 to 74	34,186	23.3%	50,861	25.6%	48.8%
75 to 79	25,637	17.5%	34,678	17.4%	35.3%
80 to 84	20,342	13.9%	21,946	11.0%	7.9%
85 or Older	20,021	13.6%	22,695	11.4%	13.4%
Total	146,742	100.0%	198,902	100.0%	35.5%

Data Source: 2010 Census SF1 Data; 2018 Single-Year-Of-Age Estimates (CDC)

Services and Housing Currently Provided

The Older Americans Act of 1965 has been the main instrument for delivering social services to senior citizens in the United States. This legislation established the federal Administration on Aging and related state programs to specifically address the many needs of the elderly population nationwide. Despite limited resources and funding, the mission of the Older Americans Act is broad: "to help older people maintain maximum independence in their homes and communities and to promote a continuum of care for the vulnerable elderly."[49] The Administration on Aging encompasses a variety of services aimed at the elderly population, such as supportive services, nutrition services, family caregiver support, and disease prevention and health promotion.

[47] http://law.justia.com/us/cfr/title24/24-4.0.2.1.12.2.3.2.html
[48] http://www.dphhs.mt.gov/sltc/services/aging/Newsletter/2012May.pdf
[49] http://www.nhpf.org/library/the-basics/Basics_OlderAmericansAct_02-23-12.pdf

In Montana, support for the elderly population is provided by the Senior and Long Term Care Division, specifically the Aging Services Unit, within DPHHS. The Aging Services Unit administers a wide variety of senior based services for residents over age 60, with the goal to provide services that allow seniors to remain independent.[50] Their programs and services include adult protective services, long term care resources, information and referral services, legal resources, community resources, and financial planning.

The 2019-2022 Montana State Plan on Aging outlines the fundamental concerns facing Montanans as the population continues to age.[51] Montana's State Plan on Aging includes the following goals:

- Goal 1: Improve access to the Older Americans Act services for seniors and their caregivers to provide the supports needed for them to continue to live in their homes and be active in their communities for as long as they choose.
- Goal 2: Improve collaboration with the Title VI Directors and other Tribal members to better facilitate Title III and Title VI coordination and services to all Montana's seniors.
- Goal 3: Improve the dignity, safety, and respect of older adults living in Montana.

Services and Housing Needed

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

According to the Center for Housing Policy, housing will be a priority need for the elderly population. A growing number of older households will face severe housing costs burdens, and many will require assisted or long-term care housing and services.[52] In addition, as the Baby Boomer generation continues to grow, many will prefer to remain independent, requiring in-home services and adaptions to existing homes. Thus, there is a greater focus on in-home care and expanded home health services to meet the needs of a more independent elderly population. Because most elderly persons are on a fixed income, these increasing costs may fall on publicly funded programs in the state.

People with Disabilities (Mental, Physical, Developmental)

HUD defines a person with a disability as any person who has a physical or mental impairment that substantially limits one or more major life activities. Physical or mental disabilities include hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS related complex, and mental retardation that substantially limits one or more major life activities. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks and caring for oneself.[53] HUD defers to Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 for the definition of developmental disability: a severe, chronic disability of an individual that is attributable to a mental or physical impairment or combination of mental and physical impairments.

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[50] http://www.dphhs.mt.gov/sltc/services/aging/index.shtml
[51] https://dphhs.mt.gov/Portals/85/sltc/documents/AgingReports/MontanaStatePlanonAging2019-2022.pdf
[52] Lipman, Barbara., Jeffery Lubell, Emily Salmon. "Housing an Aging Population: Are We Prepared?" Center for Housing Policy (2012). 21 May 2014.
[53] http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/inhousing

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

Many people with disabilities live on fixed incomes and thus face financial and housing challenges similar to those of the elderly. Without a stable, affordable housing situation, persons with disabilities can find daily life challenging. In addition, patients from psychiatric hospitals and structured residential programs have a hard time transitioning back into mainstream society without a reasonably priced and supportive living situation. The U.S. Conference of Mayors 2013 Hunger and Homeless Survey found that mental illness was cited 44% of the time as a cause of homelessness among unaccompanied individuals. Likewise, they reported that 30% of homeless adults in their cities had severe mental illness.[54]

Size and Characteristics

Table MA-39 presents a tally of disabilities by age and gender. Data in this table have not been updated since the submission of Montana's previous Consolidated Plan (2015-2019) because more current data are not available.

As shown in **Table MA-39**, Montana's total population of persons with disabilities is 127,803, with an overall disability rate of 13.1%. The age group with the highest disability rate is persons aged 75 and older. Males had a slightly higher disability rate at 13.9%, than females, at 12.3%. Children under 5 had the lowest disability rate, at less than 1% for both males and females.

Table MA-39 – Disability by Age and Gender

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

Data Source: 2012 5-Year ACS Data

Table MA-40 presents data on disabilities by type for those 5 years of age and older. Data in this table have not been updated since the submission of Montana's previous Consolidated Plan (2015-2019) because more current data are not available.

Per **Table MA-40**, the most common disability is physical disability, followed by an employment disability. The third most common disability is mental disability.

[54] http://www.usmayors.org/pressreleases/uploads/2013/1210-report-HH.pdf

Table MA-40 – Total Disabilities Tallied, Aged 5 and Older

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

Data Source: 2000 Census SF3 Data

Services and Housing Currently Provided

Under DPHHS's Developmental Services Division, the Developmental Disabilities Program contracts with private, nonprofit corporations to provide services across the lifespan for individuals who have developmental disabilities and their families. The focus of the program is to tailor care to the individual and provide it in as natural an environment as possible.[55] The Montana Development Center (MDC), which closed in 2018 in accordance with a mandate included in Senate Bill 411, was administered by the Developmental Disabilities Program and was the state's only residential facility for individuals with developmental disabilities with 24-hour care for those with the most severe behaviors or severe self-help deficits. Since closure of the MDC, House Bill 387 passed during the 2019 Montana legislative session, addressing the persisting needs of persons with disabilities through the development of the Intensive Behavior Center (IBC), a 12-bed facility that serves as an option for individuals who are not able to be safely served in the community. The IBC is in operation and currently serves adults with autism spectrum disorder in a therapeutic environment.[56]

DPHHS's AMDD administers mental health services through Medicaid programming, grant funding, the Montana State Hospital, and the Montana Mental Health Nursing Care Center. AMDD supports a continuum of mental health services, including inpatient psychiatric care, community-based habilitation services, community-based rehabilitation services, and crisis response services, all of which seek to provide services to individuals in the least restrictive environment and maintain continuity within their lives and home communities. Inpatient and residential programs, such as behavioral health group homes, adult foster care, crisis stabilization, acute inpatient hospitalization, Montana State Hospital, and Montana Mental Health Nursing Care Center inherently provide temporary shelter to individuals with mental illness on either a short-term or long-term basis. AMDD also implements supportive programming, including tenancy support services, transitional housing funds, supported employment, and wrap-around community-based services that support individuals with mental illness as they receive treatment and seek recovery.

Services and Facilities Needed

The 2020 Housing and Community Development Survey asked participants which special needs populations have the highest needs for services and facilities. Two hundred and twenty-nine participants responded, identifying five priority groups each and ranking them from 1 to 5 with 1 being the highest priority. Responses indicate the need for services and facilities for persons with disabilities is medium to low, as shown in **Table MA-41**. See **Appendix B** for a more detailed breakout of survey responses.

[55] http://www.dphhs.mt.gov/dsd/index.shtml
[56] https://dphhs.mt.gov/dsd/ibc

Table MA-41 – Need for Services and Facilities for Persons with Physical and Developmental Disabilities

	Highest Priority ("1") Ranking	Total Priority (1-5) Ranking
Persons with physical disabilities	11th of 12 (Low Priority)	8th of 12 (Medium Priority)
Persons with developmental disabilities	8th of 12 (Medium Priority)	9th of 12 (Low Priority)

Data Source: 2020 Housing and Community Development Survey

Individuals with mental illness continue to experience homelessness and housing insecurity at high rates. Mental health providers frequently cite a lack of affordable housing, a lack of housing services, and overall housing instability as a contributing factor to an individual's inability to successfully receive treatment for mental illness. Increased housing services for both housing transitions and housing maintenance, as well as the development of transitional and supportive housing units with integrated mental health services, continue to be needed within Montana.

People with Alcohol or Other Drug Addictions

According to the National Coalition for the Homeless, for persons "just one step away from homelessness, the onset or exacerbation of an addictive disorder may provide just the catalyst to plunge them into residential instability."[57] For persons with substance use disorders, housing is complicated. Persons who have stable housing are much better able to treat their addictions. However, obtaining stable housing while suffering from addiction can be quite difficult, and the frustrations caused by a lack of housing options may only exacerbate addictions. According to the 2013 U.S. Conference of Mayors Hunger and Homelessness Report, substance use is one of the most cited causes of homelessness.[58]

Size and Characteristics

DPHHS published the *2018 Montana Prevention Needs Assessment Survey* that was conducted in schools across the state to evaluate adolescent substance abuse.[59] At the time of the survey, within the past 30 days, 28.3% of students reported using alcohol, of which 16.5% reported binge drinking, and 15.0% reported using marijuana. Based on figures reported during the 2016 survey, both alcohol use and marijuana use was up in Montana's 2018 student population. In addition, the Trust for America's Health found that Montana ranked 43rd of all 50 states and the District of Columbia for highest drug overdose mortality rates in the United States in 2018, with 12.2 per 100,000 people suffering drug overdose fatalities.[60] The Trust for America's Health also found that in 2018 Montana's rate of alcohol-related deaths was 17.0 (per 100,000) and Montana's rate of drug-related deaths was 13.0 (per 100,000).[61]

Services and Housing Currently Provided

AMDD is the designated state adult mental health agency for DPHHS. The mission of AMDD is to implement and improve an appropriate statewide system of prevention, crisis intervention, treatment and recovery for Montanans with mental and substance use disorders.

AMDD assesses the need for substance use disorder treatment and prevention services throughout Montana. Those services are available through contracts with state-approved programs that practice a co-occurring approach to treatment. The division reimburses for a full range of outpatient and inpatient

[57] http://www.nationalhomeless.org/publications/facts/addiction.pdf
[58] http://www.usmayors.org/pressreleases/uploads/2013/1210-report-HH.pdf
[59] http://www.bach-harrison.com/mtsocialindicators/ProfileReports.aspx
[60] https://www.tfah.org/article/new-national-data-present-a-mixed-picture-some-drug-overdoses-down-but-others-are-up-and-suicides-rates-are-increasing/
[61] https://www.tfah.org/state-details/montana/

services, as well as education programs for DUI offenders and youth charged as a Minor in Possession. AMDD also organizes and funds activities designed to prevent the use of alcohol, tobacco, and other drugs by youth and the abuse of those substances by adults. People with substance use disorders who have family incomes below 200% of the federal poverty level are eligible for publicly funded treatment services. In addition, the Medicaid program funds outpatient and residential substance use treatment for adults and adolescents who are Medicaid eligible.

The Montana Chemical Dependency Center, located in Butte, is the only in-patient substance use treatment center administered by the State. It has 16 treatment beds for men, 16 treatment beds for women, 8 detox beds, and 8 stabilization beds.[62]

Services and Housing Needed

According to the Healthy People 2020 national objectives, there were 22 million Americans struggling with a drug or alcohol problem in 2005. Of those with substance abuse problems, 95% are unaware of their problem.[63] Obtaining treatment is a primary concern for many, which often includes high costs and other impacts on the person's ability to obtain or retain an income and housing.

The National Coalition for the Homeless notes that other needs for persons with substance use disorders include transportation and support services, including work programs and therapy access. Barriers also include programs that follow abstinence-only policies. These programs are often unrealistic for persons suffering from addictions because they fail to address the reality of relapses. A person living in supportive housing with an addiction problem who experiences a relapse may suddenly become a homeless person.[64]

Victims of Domestic Violence

Domestic violence describes behaviors that are used by one person in a relationship to control the other. This aggressive conduct is often criminal, including physical assault, sexual abuse and stalking. The U.S. Department of Justice defines domestic violence as a pattern of abusive behavior in any relationship that is used by one partner to gain or maintain power and control over another intimate partner.[65] Victims can be of all races, ages, genders, religions, cultures, education levels and marital statuses. Victims of domestic violence are at risk of becoming homeless due to an unstable living environment. If domestic violence victims flee the home, they are often faced with finding emergency shelter and services for themselves and their children. Victims of domestic violence are predominantly women. However, children can also be affected as either victims of abuse or as witnesses to abuse. The U.S. Department of Justice found that throughout their lifetime, over 25 million women and 7 million men were victimized by an intimate partner.[66]

Size and Characteristics

Pinpointing a specific number of victims of domestic violence can be difficult because many cases go unreported. However, statistics are available. According to the National Coalition Against Domestic Violence, 1 in 3 or 33% of women and 1 in 4 or 25% of men experience some form of physical violence by an intimate partner. Montana's rates of physical violence by an intimate partner are slightly higher

[62] http://www.dphhs.mt.gov/mcdc/
[63] http://www.healthypeople.gov/2020/TopicsObjectives2020/overview.aspx?topicId=40#star
[64] http://www.nationalhomeless.org/publications/facts/addiction.pdf
[65] https://www.ovw.usdoj.gov/domviolence.htm
[66] https://www.ojp.gov/pdffiles1/nij/183781.pdf

than the national figures, with 39.2% of women and 32.6% of men experiencing intimate partner physical violence in their lifetimes.[67]

According to the 2019 PIT Homeless Survey, there were 1,357 homeless persons in Montana in 2019. Of this count, 257 (18.9%) persons indicated they left home because of domestic violence. Of note, 69.3% of primary respondents and accompanying individuals who cited domestic abuse resulting in homelessness were female. See **Table MA-42** for detailed counts.

Table MA-42 – Homeless Persons who Left Home because of Domestic Violence

Gender	Count of Primary Respondents	Count of Accompanying Individuals	Total Count
Males	26	52	78
Females	129	49	178
Missing or N/A	1	0	1
Total Count	156	101	257

Data Source: 2019 Montana Homeless Survey

Services and Housing Currently Provided

The Montana Coalition Against Domestic & Sexual Violence is a statewide coalition of individuals and organizations working together to end domestic and sexual violence through advocacy, public education, public policy, and program development. The Coalition's goals are to eliminate all forms of oppression, to provide support, network opportunities and training, and to encourage increased awareness and understanding.[68]

Services for victims of domestic abuse are provided by a variety of nonprofit and faith-based organizations across the state. Many of the shelters have 24-hour crisis lines and offer temporary housing, advocacy, referral programs, counseling, and transportation, as well as many other services. A partial list of domestic violence service providers is shown in **Table MA-43**.

Table MA-43 – Domestic Violence Service Providers

Homeless Service Organization	Counties Served
Rosebud & Treasure County Victim Witness Program	Rosebud, Treasure
Glasgow Police Department – Victim Witness	Valley, Daniels, Sheridan, Phillips
Dawson County Domestic Violence & Sexual Assault Program	Dawson, Wibaux, Prairie
Phillips County Domestic Violence Program	Phillips
Custer Network Against Domestic Abuse & Sexual Assault	Custer, Rosebud, Treasure, Garfield, Powder River
Custer County Attorney's Victim-Witness Assistance	Custer, Carter, Fallon, Powder River, Garfield
Richland County Coalition Against Domestic Violence	Richland, McCone
The Family Violence Resource Center	Fort Peck Reservation
Northeast Montana Victim/Witness Program	Phillips, Valley, Roosevelt, Sheridan, Daniels
7th Judicial District Victim Witness Program	Dawson, Wibaux, Prairie, McCone, Richland
Angela's Piazza: Women's Drop-In Center	Yellowstone
Montana Legal Services Association	Yellowstone, Big Horn, Carbon, Golden Valley, Musselshell, Park, Rosebud, Stillwater, Sweet Grass, Wheatland, Treasure
Billings Area Family Violence Task Force	Yellowstone
Billings City Attorney's Office Domestic Violence Unit	Yellowstone

[67] https://assets.speakcdn.com/assets/2497/montana_2019.pdf
[68] http://mcadsv.com/about/philosophy/

Homeless Service Organization	Counties Served
Yellowstone County Attorney's Office – Victim Witness Office	Yellowstone
YWCA Billings – Gateway	Yellowstone, Carbon, Stillwater, Big Horn, Rosebud, Musselshell
Stillwater County Advocates	Stillwater
Crow Victims Assistance Program	Crow Reservation
Healing Hearts	Northern Cheyenne Reservation
Northern Cheyenne Tribe	Northern Cheyenne Reservation
ASPEN	Meagher, Park, Sweet Grass
Park County Victim Witness Assistance Program	Park
Carbon County Victim-Witness Program	Carbon
Domestic and Sexual Violence Services of Carbon County	Carbon, Stillwater
Montana Legal Services Association	Blaine, Glacier, Hill, Pondera, Liberty, Teton, Toole
Hi-Lines Help for Abused Spouses	Chouteau, Glacier, Toole, Teton, Pondera, Liberty
CASA CAN Children's Advocate Network	Cascade
Family Advocacy	Malmstrom Air Force Base Personnel and Families
YWCA Great Falls	Cascade, Toole, Pondera, Teton, Glacier, Chouteau, Judith Basin, Meagher, Liberty
Victim Impact Program – Pre-release Program	Cascade
Victim-Witness Assistance Program	Cascade, Others as Needed
Voices of Hope	Cascade
Domestic Violence Program/Judicial Court	Fort Belknap Reservation, Blaine
District IV HRDC Domestic Abuse Program	Hill, Blaine, Liberty
Fergus County Attorney Victim Assistance Program	Fergus, Petroleum, Judith Basin
SAVES, Inc.	Fergus, Wheatland, Golden Valley, Musselshell, Garfield, Petroleum, Judith Basin
Musselshell/Golden Valley Victim Witness Assistance Program	Musselshell, Wheatland, Golden Valley
SAVES, Inc. – Satellite Office	Musselshell, Wheatland, Golden Valley
Toole County Victim Advocate Program	Toole
Anaconda Victim Witness Program	Deer Lodge
Jefferson County Victim/Witness Advocate Program	Jefferson
Gallatin County Victim Assistance	Gallatin
HAVEN	Gallatin, Madison, Meagher
Help Center	Gallatin, Madison, Park
MSU Voice Center	Montana State University
Butte Silver Bow County Attorney Victim Witness Advocate Program	Silver Bow
Montana Legal Services Association	Beaverhead, Deer Lodge, Gallatin, Granite, Madison, Powell, Silver Bow
Safe Space, Inc.	Silver Bow, Deer Lodge, Powell, Granite, Jefferson, Madison
Powell County Victim Services	Powell
Women's Resource Center/Community Support Center	Beaverhead, Madison
City of Helena Victim Services – City Attorney's Office	Lewis & Clark
Friendship Center	Lewis & Clark, Jefferson, Broadwater, Meagher
Montana Legal Services Association	Lewis & Clark, Jefferson, Broadwater, Meagher
YWCA of Helena	Lewis & Clark, Jefferson, Broadwater
Broadwater County Attorney Victim Witness Program	Broadwater
Beaverhead & Madison County Victim/Witness Advocacy Program	Beaverhead, Madison

Homeless Service Organization	Counties Served
SAFE	Ravalli
Flathead County Attorney's Office	Flathead
The Abbie Shelter	Flathead
Lincoln County Crisis Solutions	Lincoln
Lincoln County Victim Witness Program	Lincoln
First Step Resource Center – Saint Patrick Hospital	Missoula, Ravalli, Granite, Powell, Sanders, Lake, Flathead Reservation, Any County Requesting Services
Missoula City-County Relationship Violence Services Crime Victim Advocate Services	Missoula
Montana Legal Services Association	Mineral, Missoula, Ravalli, Sanders
Student Advocacy Resource Center	Missoula
YWCA of Missoula	Missoula, Mineral, Sanders, Granite, Lake, Ravalli
CSK Tribal Crime Victim Advocate Program	Flathead Reservation, Lake, Sanders, Missoula
SAFE Harbor	Lake, Flathead Reservation
Granite County Victim-Witness Program	Mineral
Mineral County Crime Victim Advocate Program	Mineral
Mineral County Help Line	Mineral
Sanders County Coalition for Families	Sanders

Data Source: Montana Coalition Against Domestic Violence

Services and Housing Needed

The 2020 Housing and Community Development Survey asked participants which special needs populations have the highest needs for services and facilities. Two hundred and twenty-nine participants responded, identifying five priority groups each and ranking them from 1 to 5 with 1 being the highest priority. Responses indicate the need for services and facilities for victims of domestic violence is medium, as shown in **Table MA-44**. See **Appendix B** for a more detailed breakout of survey responses.

Table MA-44 – Need for Services and Facilities for Victims of Domestic Violence

	Highest Priority ("1") Ranking	Total Priority (1-5) Ranking
Victims of domestic violence	6th of 12 (Medium Priority)	5th of 12 (Medium Priority)

Data Source: 2020 Housing and Community Development Survey

People with HIV/AIDS and Their Families

National research demonstrates that housing is the greatest unmet service need among people living with HIV/AIDS. Part of this can be attributed to several personal and structural factors unique to this population: loss of income due to progressive inability to maintain employment, disease progression requiring accessible facilities, and policy requirements that limit residence in temporary or transitional programs. It is estimated that as many as half of all people living with HIV/AIDS will need housing assistance at some point in their illness.[69]

In addition, homelessness is a barrier to outpatient care and HIV/AIDS specific therapies. The National Coalition for the Homeless reports that between one-third and one-half of all persons with HIV/AIDS are either homeless or at risk for becoming homeless.[70] Research shows that among people with HIV/AIDS, there is a strong correlation between housing and improved access to, ongoing engagement in, and treatment success with health care. When people are housed, they can access and adhere to drug treatments and therapies, which may require fewer hospitalizations and emergency care.[71] This is

[69] http://nationalaidshousing.org/legisadvocacy/hopwa/
[70] http://www.nationalhomeless.org/publications/facts/HIV.pdf
[71] http://nationalaidshousing.org/legisadvocacy/hopwa/

partially due to the fact that complex medication regimens require that medicines be refrigerated and administered according to a strict schedule. Furthermore, homeless HIV positive individuals have a death rate that is five times greater than that of housed HIV positive people, 5.3 to 8 deaths per 100 people compared to 1 to 2 per 100 people.[72]

Size and Characteristics

According to information gathered from DPHHS, a total of 749 persons were living with HIV infection in Montana as of January 4, 2021. A total of 1,299 cases of HIV have been reported in Montana, of which 550 persons are known to have died. The HIV Epidemiology Profile for Montana released additional data regarding characteristics of those diagnosed with HIV. Males have attributed for 85% of this population. The largest age group that has received diagnoses were those age 55 and over, accounting for 40%. Non-Hispanic, white persons account for the highest portion of the HIV population at 85%.

The demographic distribution of new HIV diagnoses in Montana during the 2011-2018 period reveals that new cases are not evenly distributed among Montana's counties. Yellowstone (26%), Missoula (18%), Cascade (9%), Gallatin (9%) and Flathead (8%) counties accounted for more than 70% of new HIV diagnoses between 2001 and 2018.[73] This is also consistent with the counties with the highest population of persons living in Montana and living with HIV.

Services and Housing Currently Provided

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

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

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

[72] http://www.nationalaidshousing.org/PDF/Housing%20&%20HIV-AIDS%20Policy%20Paper%2005.pdf
[73] https://dphhs.mt.gov/Portals/85/publichealth/documents/CDEpi/StatisticsandReports/SurveillanceSnapshots/ADAHIVsnapshot2018.pdf

Table MA-45 – HIV Service Providers

Service Organization	Location
RiverStone Health	Billings
District VII HRDC	Billings
Rocky Boy Tribal Health	Box Elder
Bridger Clinic	Bozeman
District 9 HRDC	Bozeman
Browning Tribal Health	Browning
Butte AIDS Support Services	Butte
Dawson County Health Department	Glendive
Hill County Health Department	Havre
Lewis and Clark City-County Health Department	Helena
Flathead City-County Health Department	Kalispell
Central Montana Family Planning	Lewistown
Open AID Alliance	Missoula
Partnership Health Center	Missoula

Data Source: DPHHS

Services and Housing Needed

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

The 2020 Housing and Community Development Survey asked participants which special needs populations have the highest needs for services and facilities. Two hundred and twenty-nine participants responded, identifying five priority groups each and ranking them from 1 to 5 with 1 being the highest priority. Responses indicate the need for services and facilities for persons with HIV/AIDS is low (in relation to other special needs populations), as shown in **Table MA-46**. See **Appendix B** for a more detailed breakout of survey responses.

Table MA-46 – Need for Services and Facilities for Persons with HIV/AIDS

	Highest Priority ("1") Ranking	Total Priority (1-5) Ranking
Persons with HIV/AIDS	12th of 12 (Low Priority)	12th of 12 (Low Priority)

Data Source: 2020 Housing and Community Development Survey

MA-45 Non-Housing Community Development Assets – 91.315(f)

Introduction

According to DLI's *2020 Labor Day Report*[74], Montana and the nation as a whole experienced the longest economic expansion in history from July 2009 and February 2020. During this period, Montana workers expanded their economic output by roughly 20% and added nearly 50,000 payroll jobs. The state's

[74] http://lmi.mt.gov/Portals/193/Publications/LMI-Pubs/Special%20Reports%20and%20Studies/LDR-2020-Accessible.pdf

economy became more diverse and robust, increasing real personal income, wages, and Montanans' standard of living. From 2009 to 2020, real GDP expanded by 19.8% to $47.1 billion, and personal income expanded by 52% to $52.4 billion.

However, in March 2020, the COVID-19 pandemic struck Montana, prompting the state's economic performance to quickly change as public health and safety measures were enacted to stop the spread of the virus. The COVID-19 mitigation measures caused a large but temporary impact to short-term economic performance, resulting in sharp increases in Unemployment Insurance claims and a need for relief for individuals, businesses, and industries. In Montana, the pandemic-induced recession appears to have been relatively short, with employment levels quickly rebounding after the phased reopening of the economy. Montana had the 16th smallest job loss among states, and jobs have been quick to return with roughly 40,000 payroll positions added in May and June. Even with a strong recovery and rapid job growth, it is likely that the pandemic will have continued impacts on Montana's economy. The magnitude of the job loss during the first months of the pandemic means that it may take several years for unemployment levels to rebound.

Economic Development Market Analysis

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

Business Activity

Table 43 – Business Activity

Business by Sector	Number of Workers	Share of Workers %
Agriculture, Mining, Oil and Gas Extraction	34,930	7.5%
Arts, Entertainment, Accommodations	54,080	11.6%
Construction	40,942	8.8%
Education and Health Care Services	116,588	24.9%
Finance, Insurance, and Real Estate	27,881	6.0%
Information	8,468	1.8%
Manufacturing	23,204	5.0%
Other Services	24,608	5.3%
Professional, Scientific, Management Services	41,195	8.8%
Public Administration	0	0.0%
Retail Trade	59,171	12.7%
Transportation and Warehousing	24,692	5.3%
Wholesale Trade	11,932	2.6%
Total	467,691	100.0%

Data Source: 2015-2019 ACS (Workers), 2019 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Table 44 – Labor Force

Criteria	Status
Total Population in the Civilian Labor Force	526,388
Civilian Employed Population 16 years and over	497,995
Unemployment Rate	4.8%
Unemployment Rate for Ages 16-24	N/A
Unemployment Rate for Ages 25-65	N/A

Data Source: 2017 5-Year ACS

Table 45 – Occupations by Sector

Occupations by Sector	Number of People
Management, business and financial	76,551
Farming, fisheries and forestry occupations	8,617
Service	94,399
Sales and office	111,134
Construction, extraction, maintenance and repair	62,437
Production, transportation and material moving	48,322

Data Source: 2017 5-Year ACS

Travel Time

Table 46 – Travel Time

Travel Time	Number	Percentage
< 30 Minutes	382,809	83.3%
30-59 Minutes	58,736	12.8%
60 or More Minutes	17,882	3.9%
Total	459,427	100.0%

Data Source: 2017 5-Year ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Table 47 – Educational Attainment by Employment Status

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	16,661	1,891	13,555
High school graduate (includes equivalency)	104,969	5,723	37,759
Some college or associate's degree	134,299	5,690	40,582
Bachelor's degree or higher	138,454	3,248	23,055

Data Source: 2017 5-Year ACS

Educational Attainment by Age

Table 48 – Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	1,488	1,909	1,614	4,165	6,838
9th to 12th grade, no diploma	11,868	7,150	5,042	12,227	10,499
High school graduate, GED, or alternative	34,311	33,783	30,300	84,531	57,709
Some college, no degree	40,552	32,988	27,024	69,576	40,538
Associate's degree	4,147	12,479	12,763	26,799	9,677
Bachelor's degree	7,029	31,383	28,163	54,527	31,016
Graduate or professional degree	390	9,753	13,853	27,752	19,861

Data Source: 2017 5-Year ACS

Educational Attainment – Median Earnings in the Past 12 Months

Table 49 – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	$20,453
High school graduate (includes equivalency)	$27,027
Some college or Associate's degree	$30,517
Bachelor's degree	$40,403
Graduate or professional degree	$53,595

Data Source: 2011-2015 ACS

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

In order of share, the employment sectors are:

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

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

According to MEDA's *Montana Next Generation Analysis*, the state needs to invest in infrastructure to continue to attract talent and business, including remote business.[75] Therefore, increased investments in broadband and 5G technology will attract new development, and help Montana's existing businesses grow and innovate. In terms of workforce, *Montana's Next Generation Analysis* identified that Montana is a state with a high level of state-to-state migration, with 5,000 domestic in-migrants per 100,000 residents. This ongoing influx of new residents can be a positive catalyst for economic dynamism and workforce development. However, MEDA emphasized the importance of workforce development programs and affordable housing to retain this economic driver. Furthermore, respondents to the 2020 Housing and Community Development Survey indicated that affordable housing for the workforce especially teachers and service industry workers, the elderly, and the disabled is in short supply throughout the state.

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

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

[75] https://www.medamembers.org/media/userfiles/subsite_48/files/2020-06-30%20Montana%20Next%20Generation%20Analysis%20%20FINAL.pdf

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

One of Montana's strengths is our educated workforce. 94% of Montana's population has a high school diploma, and 31% of Montana's population has a bachelor's degree or higher. Our skilled workforce and quality K-12 education system are recognized as an important strength, but we must provide education and training opportunities aligned with the needs of the private sector. Forming partnerships among educators, workforce development professionals, and the private sector will help identify opportunities to connect education and training to the skills necessary in an ever-changing economy.

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

There are a variety of workforce training initiatives in Montana. These include workforce training initiatives in the trade, transportation, and utility; professional and business services; manufacturing; leisure and hospitality; and education and health services sectors. A complete list of programs and training providers is supplied on DLI's website at http://lmi.mt.gov/Career/Programs.

Describe any other state efforts to support economic growth.

According to Governor Gianforte's *Montana Comeback Plan*, priorities for economic growth include:

- Develop value-added agriculture to preserve the Montana brand through our supply chains, and to ensure that Montana producers can capture more of the value they create.
- Expand manufacturing through investing in trades education and apprenticeship opportunities, creating workers with in-demand skills and better-paying jobs.
- Grow the technology sector through incentives, such as broadband, to encourage bringing remote work jobs and technology companies to Montana.
- Responsibly develop our natural resources, balancing economic growth with conservation.
- Boost tourism, travel, and hospitality, supporting these leading industries in Montana as they recover from the COVID-19 pandemic.

Discussion

Prior to 2007, unemployment in Montana had been on a generally downward trend for nearly two decades thanks to the steady growth in the number of employed persons, which slightly but consistently outpaced the rate at which new members were added to the labor force. However, a large growth in unemployment came after 2007, when the unemployment rate jumped and continues to rise until 2010. Since 2010, the unemployment rate in the state has been falling steadily, reaching 5.6%. Looking at this rate compared to the national unemployment rate, Montana has had a lower rate than the national average since 2002, as shown in **Figure 6**.

Figure 7 shows the state unemployment rate since 2008. The state saw its highest unemployment rate at the beginning of 2010 and it has been declining since that time, reaching 6.5% at the end of 2013.

Full- and Part-Time Employment

The U.S. Bureau of Economic Analysis provides an alternate index of employment; a count of full-time and part- time jobs in the state (**Figure 8**). These data differ from the U.S. Bureau of Labor Statistics data discussed previously in that they are collected where workers are employed rather than at the household level, and the same person may be counted twice in this dataset if he or she works more than one job.

Figure 6 – Unemployment Rate

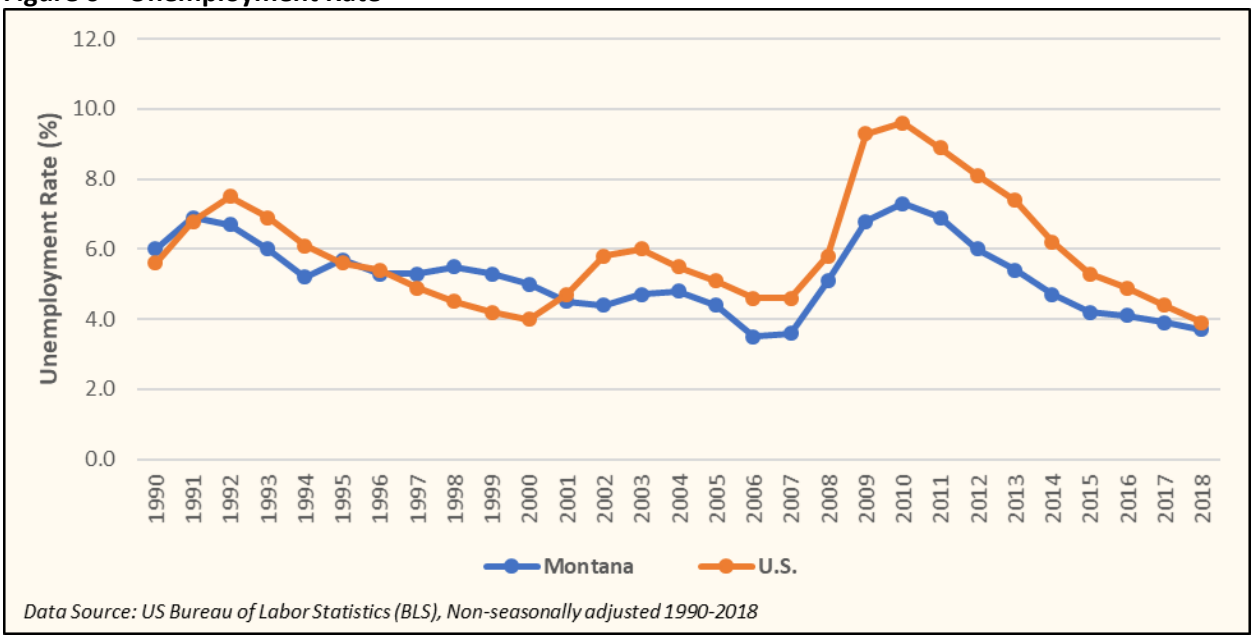


Figure 7 – Montana Unemployment Rate

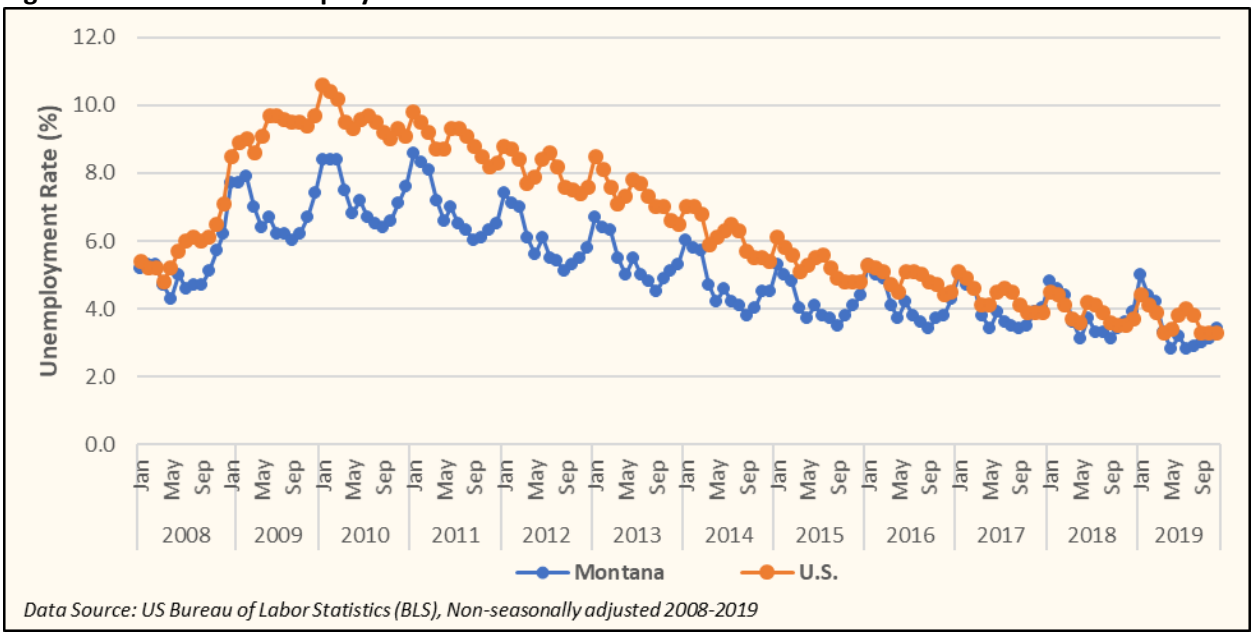
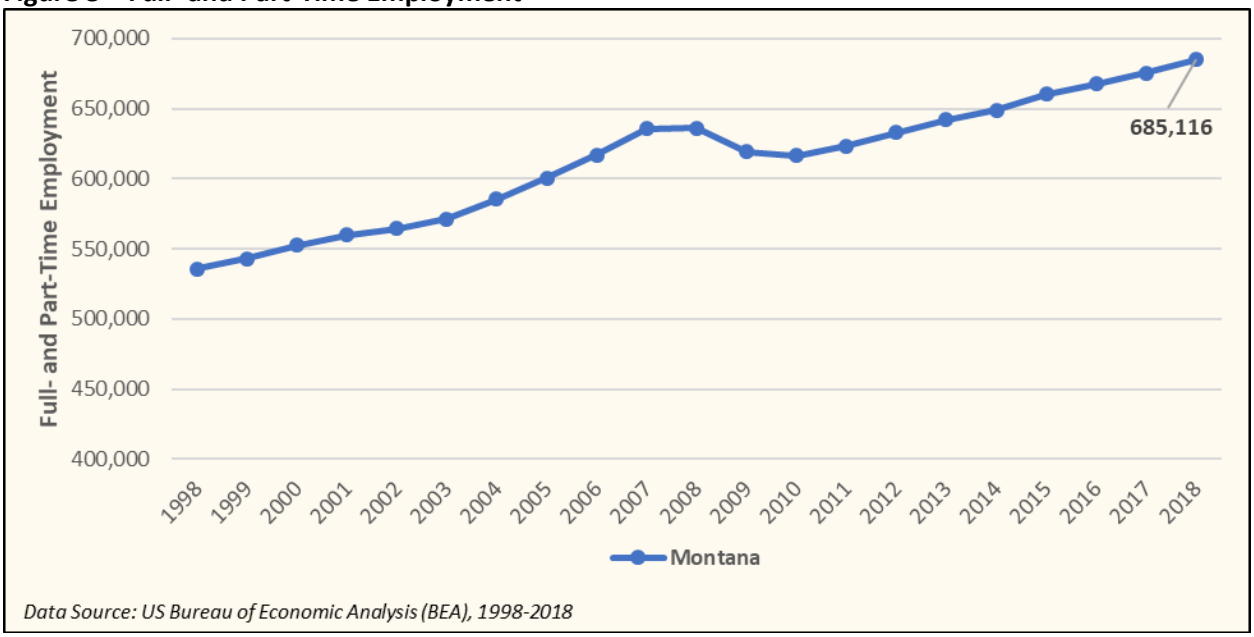


Figure 8 – Full- and Part-Time Employment



MA-50 Needs and Market Analysis Discussion

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

The number of housing units with at least one or more housing problems is concentrated in the following Census Tracts indicated in the colored sections of **Map 6**. Concentration is defined as those areas in the 75th percentile on a statewide basis. The percentages of concentration are listed below.

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

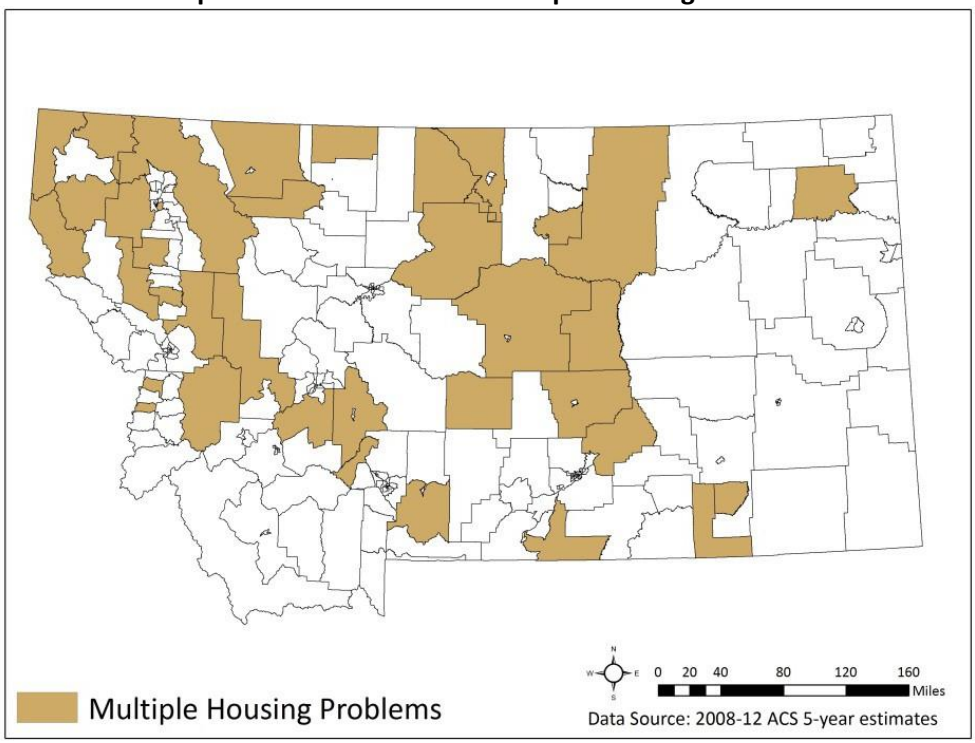
Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Map 7 and **Map 8** reflect areas with greater than 25% of the populations declaring a racial category other than "white only" based on ACS data. According to ACS data, "income" is areas with >30% low income. Concentration is defined as a percentage of the population greater than 25%.

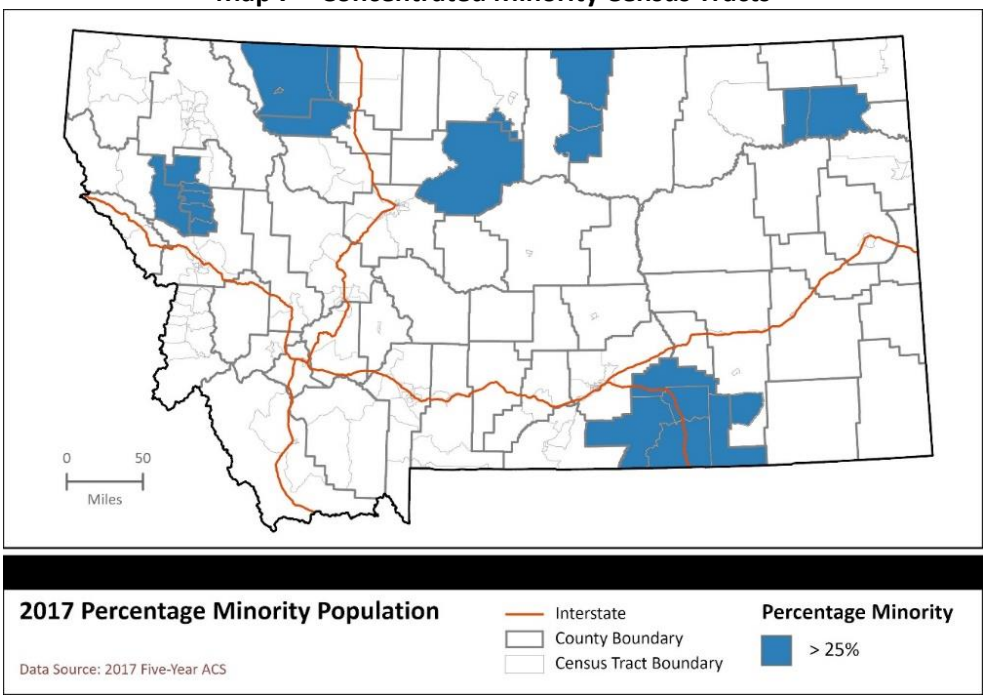
What are the characteristics of the market in these areas/neighborhoods?

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

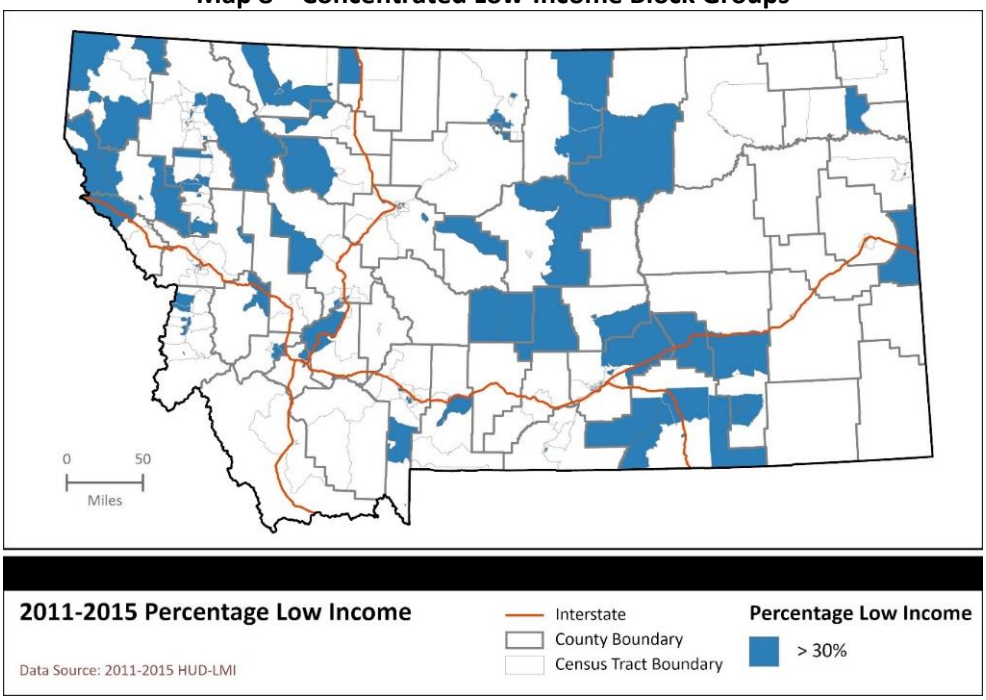
Map 6 – Concentrations of Multiple Housing Problems



Map 7 – Concentrated Minority Census Tracts



Map 8 – Concentrated Low-Income Block Groups



Are there any community assets in these areas/neighborhoods?

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

Are there other strategic opportunities in any of these areas?

The State of Montana interacts with other agencies, businesses, developers, social service agencies and other organizations to enhance the coordination of efforts to develop housing, support communities, and generate economic development. Commerce supports a broad-based approach to address affordable housing and community development issues through the Consolidated Plan Steering Committee, W2ASACT, and MEDA.

Additionally, CTAP, which is housed within CDD, provides direct technical assistance to local governments and elected officials, land use planners, associated professionals and members of the public on issues related to land use planning and development throughout the state. CTAP helps educate constituents on planning best practices, policy and even regulations that promote affordable housing and support resilient community and economic development. Through hands-on training, workshops, webinars, online resources, direct technical assistance by phone or email, and collaboration with local, state and federal agencies, communities learn how to more effectively utilize policy, code, and regulations such as zoning, subdivision, building code and tax increment financing tools to help—not hinder—the development of affordable housing alternatives in their jurisdiction. Additionally, the link between affordable housing and transportation alternatives, proximity to jobs, public services and education is also an important focus of the CTAP program.

The Montana Main Street Program, also housed within CDD, further supports these actions by offering additional technical assistance aimed at downtown revitalization through proactive planning and development incentives that support rural communities.

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

Summary

In 2005, the State of Montana had 449,791 total housing units. Since that time, the total housing stock has increased the number of units, reaching 519,935 units in 2019. According to the ACS in 2017, Montana's housing stock included 364,518 single-family units, and 54,998 mobile home units. Of the 501,099 housing units counted in Montana in the 2017 ACS, 419,975 units were occupied, with 284,168 counted as owner-occupied and 135,807 counted as renter occupied. This equated to a homeownership rate of 67.7%. Montana has a homeowner vacancy rate of 1.4% and a rental vacancy rate of 6.3%. The construction value of single-family dwellings generally increased from 1980 through 2018, reaching over $210,000.

Results from the 2020 Housing and Community Development Needs Survey regarding housing topics showed needs prioritized as follows: new construction of affordable rental housing, new construction of affordable for-sale housing, rental assistance, and first-time homebuyer education and down payment assistance. Comments received from focus group meetings echoed these sentiments, indicating that there is an increased demand for affordable rental housing.

Results from the 2020 Housing and Community Development Needs Survey regarding human and public service topics showed needs prioritized as follows: childcare services, mental health and chemical dependency services, youth services, transportation services, and healthcare services.

In addition, the 2020 Housing and Community Development Needs Survey indicated the highest need for a specific subset of a population prioritized as follows: persons with mental illness, persons that are homeless or at risk of homelessness, and persons with substance use disorders.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Montana ranks 50th in the nation among states scored by broadband coverage, speed, and price access in 2020[76]. Only 86.7% of Montanans have access to competitive broadband service, compared to the national average of 94.3%.[77] In rural and tribal areas, access to competitive broadband service is even lower; only 73.3% of persons in rural areas and 73.5% of persons in tribal areas have access to competitive broadband service. In addition, 11 out of Montana's 56 counties have less than 50% broadband coverage and 4 out of Montana's 56 counties have less than 25% broadband coverage. The Federal Communications Commission (FCC) defines competitive broadband coverage as three or more service providers of asymmetrical digital subscriber line (ADSL), cable, fiber, fixed wireless, or satellite

[76] https://broadbandnow.com/research/best-states-with-internet-coverage-and-speed
[77] https://www.medamembers.org/media/userfiles/subsite_48/files/2020-06-30%20Montana%20Next%20Generation%20Analysis%20%20FINAL.pdf

service at speeds of great than or equal to 25 Mbps (download) and 3 Mbps (upload). In Montana, substantial numbers of low- and moderate-income households reside in both rural and tribal areas, so the need for broadband wiring and connections could be significant.

The State of Montana is committed to expanding broadband access, especial in rural communities. According to Governor Gianforte's *Montana Comeback Plan*, it is a statewide priority to work with consumers, stakeholders, and service providers to increase broadband access throughout Montana to close the digital divide.[78] To accomplish this, the State of Montana is dedicated to balancing resources available from HUD for broadband infrastructure – particularly through CDBG and HOME – with other state and federal resources, such as the Coronavirus State Fiscal Recovery Funds under the American Rescue Plan Act of 2021, which can be used to make necessary investments in broadband infrastructure.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Montana is the least competitive broadband marketplace in the nation; the lack of internet access and competition is due to Montana's geography. In total, there are 120 providers offering competitive broadband services within the state.[79] 205,000 residents only have one provider to choose from, another 36,000 people do not have any provider offering services at their home address. However, not all Montana residents have so few choices. Certain places in Montana are well-connected; when it comes to speed, price, and availability, the best ranking cities in Montana are Billings, Great Falls, Kalispell, Missoula, and Butte.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

According to Commerce's *Montana Resiliency Framework*, natural disasters—particularly wildfires, droughts, flooding, and severe storms—threaten communities across the state and are projected to accelerate due to climate change.[80] According to the Montana Department of Emergency Services' (DES) *State of Montana Multi-Hazard Mitigation Plan*, the hazards that pose the most threat for the state—listed based on probability, severity, and impact—are: wildfires, flooding, earthquakes, droughts, and severe weather.[81] From 2000 through 2014, there were more than 240 large wildfires (>5,000 acres) within 10 miles of Montana communities, affecting more than 230,000 Montana residents. From 2010 to 2014, there were five federal disaster declarations for flooding in Montana, causing millions of dollars of damage to roads, bridges, buildings, and homes. Montana is also one of the most seismically active states in the United States; since 1925, there have been five shocks that have reached intensity VII or greater, and hundreds of less severe tremors felt throughout the state.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

The types of natural disasters that pose the greatest risk to housing occupied by low- and moderate-income households in Montana are flooding, wildfires, and severe weather. The State of Montana has not undertaken a comprehensive study to measure the risk of these natural disasters specifically to low- and moderate- income households.

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[78] https://gregformontana.com/wp-content/uploads/2020/08/Montana-Come-Back-Plan.pdf
[79] https://broadbandnow.com/Montana
[80] https://comdev.mt.gov/Portals/95/shared/MRCI/docs/Montana-Resiliency-Framework.pdf?ver=2021-01-13-114713-527
[81] https://drought.unl.edu/archive/plans/GeneralHazard/state/MT_2018.pdf

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The goals of this strategic plan align with Montana's goals to provide decent housing, a suitable living environment, and expanded economic opportunities for the state's extremely low, low-, and moderate-income residents. The State of Montana strives to accomplish these goals by maximizing and effectively utilizing all available funding resources to conduct housing and community development activities that serve the economically disadvantaged residents of the state. By addressing need and creating opportunity at the individual and neighborhood levels, the State of Montana aims to improve the quality of life for all residents of the state. The goals of this strategic plan are as follows:

- *Provide decent housing* by supporting appropriate housing for homeless persons and assisting those at risk of homelessness; preserving the affordable housing stock; increasing the supply of permanent affordable housing, without discrimination; increasing the supply of supportive housing for persons with special needs (e.g., the elderly; frail elderly; persons with mental, physical, and developmental disabilities; persons with substance use disorders; persons with HIV/AIDS and their families; public housing residents; Veterans; and victims of domestic violence); supporting homeownership through homebuyer assistance; and providing affordable housing near job opportunities.
- *Provide suitable living environments* by improving the safety and livability of neighborhoods; improving access to quality facilities, infrastructure, and services; reducing the isolation of income groups within communities through de-concentration of low-income housing; revitalizing deteriorating neighborhoods; restoring and preserving properties of special historic architectural or aesthetic value; and conserving energy resources.
- *Expand economic opportunities* by creating and retaining jobs; establishing, stabilizing, and expanding small businesses; providing public employment services; encouraging the employment of low-income persons in projects funded under this plan; providing reasonable mortgage financing rates without discrimination; providing access to capital and credit for development activities that promote long-term economic and social viability of the community; and reducing generational poverty of those living in publicly assisted housing by providing empowerment and self-sufficiency opportunities.

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

Housing and community development needs vary widely across Montana. The extreme diversity in available housing, age of housing stock, and overall range in population complicate the assessment of the type and degree of housing and community development needs. Because of the limited availability of resources and the extent of community development and housing needs, Commerce and DPHHS programs are implemented on a statewide basis rather than with geographic priorities.

Entities receiving CDBG, HOME, and HTF funds typically have previous grant awards substantially drawn down before they are eligible to apply for additional program funds. This method has been shown to disburse funds equitably throughout the state, providing all areas an opportunity to apply for funds and providing an incentive for grant recipients to complete projects on a timely basis. Over time, all funding methods, whether through a formula, competitive, or non-competitive process, tend to effectively distribute grant assistance throughout the state.

Because the State of Montana does not have geographic priorities for any of its federally funded CPD programs, data are not provided in **Table 50**.

Table 50 – Geographic Priority Areas

Area Name	Area Type	Area Description
N/A	N/A	N/A

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Priorities for funding are based on the following: the Consolidated Plan Needs Assessment and Market Assessment; feedback from the Fair Housing and Housing and Community Development surveys, focus groups, and public meetings; and the objectives and outcomes set by the State of Montana to identify projects that help communities improve access to affordable housing and transportation while protecting the environment and measuring the true cost of commuting to residents of affordable housing. The State's housing and community development needs are established and prioritized by local communities and addressed through the State's process of distributing funds to local communities (see AP-30 Methods of Distribution).

SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

Table 51 – Priority Needs Summary

#	Priority Need	Priority Level	Population			
			Income Level	Family Type	Homeless	Non-Homeless Special Needs
1	Affordable Housing Preservation and Construction	High	Extremely Low Low Moderate Middle*	Large Families Families with Children Elderly Public Housing Residents	See below for Priority to Reduce Homelessness	Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
		Description: Encourage rehabilitation of existing and development of new rental and owner-occupied affordable housing located within walkable neighborhoods and/or served by public transportation systems, particularly for those with special needs and the elderly. **Basis for Relative Priority:** As shown in the Needs Assessment, approximately 56,575 renter households and 52,830 homeowner households in the state have one or more housing problems. Of households with housing problems, 25,250 renters (45%) and 34,545 (65%) owners are cost burdened, paying more than 30% of their income on housing expenses. The proportion of these households that are severely cost burdened, paying more than 50% of their income on housing expenses is more than 43% for both renters and owners (25,130 and 22,715, respectively). Results from the 2020 Montana Housing and Community Development Survey show that preserving and constructing affordable housing is a high priority, with more than 93% of respondents indicating that they would allocate resources to this category. *Neighborhood Stabilization Program (NSP) only				

#	Priority Need	Priority Level	Population			
			Income Level	Family Type	Homeless	Non-Homeless Special Needs
2	Community Planning	High	Extremely Low Low Moderate	Large Families Families with Children Elderly Public Housing Residents	Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth	Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-Housing Community Development
		Description: Encourage comprehensive planning, downtown master planning, business development planning, market studies, preliminary architectural reports, asset management, needs analysis, preliminary engineering reports, flood prevention plans, and other studies or plans that support the sustainability of local communities, affordable housing, public works investments, vital employment centers, and the environment. **Basis for Relative Priority:** The first step in revitalizing communities, improving the efficiency of public works investments, and safeguarding rural landscapes and natural resources is planning. Planning for the location and density of future land uses, the needs for public facilities and amenities, the economic and marketing strategy of a community or business, and preliminary design of a potential project results in efficient, affordable, and resilient development and helps communities prioritize local projects. Approximately 69% of respondents to the 2020 Montana Housing and Community Development Survey indicated that they would allocate resources to planning for communities.				
3	Improving and Sustaining Vital Public Infrastructure	High	Extremely Low Low Moderate	Large Families Families with Children Elderly Public Housing Residents	Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth	Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-Housing Community Development
		Description: Provide funding opportunities to serve Montanans of low income, particularly special needs and elderly populations, with safe, efficient public infrastructure; improve the safety and efficiency of public infrastructure; promote healthy, safe, and walkable neighborhoods; and safeguard the environment. **Basis for Relative Priority:** In the fall of 2014, the Montana Section of the American Society of Civil Engineers (ASCE) issued a cumulative grade of C- for Montana's aging infrastructure. The report warned that Montana's aging infrastructure is approaching a critical state of disrepair, from neighborhood roads and community schools to safe drinking water, from dams that produce energy and prevent flooding to waterways that irrigate fields, this infrastructure is used by all Montana residents and is essential to our economic future. The State of Montana is committed to investing its federal funds to provide safe, efficient public infrastructure to serve Montanans, particularly those of low to moderate income or with special needs. Results from the 2020 Montana Housing and Community Development Survey show that improving and sustaining public infrastructure is a high priority, with more than 90% of respondents indicating that they would allocate resources to this category. Results also indicate that preserving and constructing community and public facilities is a high priority, with approximately 77% of respondents indicating that they would allocate resources to this category.				

#	Priority Need	Priority Level	Population			
			Income Level	Family Type	Homeless	Non-Homeless Special Needs
4	Economic Revitalization	High	Extremely Low Low Moderate	Large Families Families with Children Elderly Public Housing Residents	Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth	Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-Housing Community Development
		Description: Support and strengthen new and existing businesses, particularly those located within traditional downtown business centers comprising a mix of businesses, housing, and services. **Basis for Relative Priority:** As industries shift in Montana and the United States, many communities within the state are struggling with the lack of well-paying jobs, cost of attracting new businesses, and disinvestment in their downtowns. According to the U.S. Environmental Protection Agency, this type of degradation causes residents, visitors, and businesses to relocate as economic opportunities, property values, health outcomes, and community vitality declines. To reverse this trend, Montana needs to invest in economic infrastructure, job training, and downtowns that will catalyze businesses with well-paying jobs. Furthermore, to attract and retain this workforce, Montana needs to create vibrant, walkable, and unique communities with access to work, schools, and other amenities. Results from the 2020 Montana Housing and Community Development Survey show that revitalizing local economies is a high priority, with more than 76% of respondents indicating that they would allocate resources to this category.				
5	Reducing Homelessness	High	Extremely Low	Large Families Families with Children Elderly Public Housing Residents	Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth	N/A
		Description: Encourage activities that provide assistance and shelter to homeless Montanans and those at risk of homelessness, particularly homeless veterans, youths and children, and the chronically homeless living in unsheltered locations. **Basis for Relative Priority:** HUD released the 2019 AHAR documenting the national issues related to homelessness. As documented in the AHAR, the nation's homelessness declined (-12.3%) from 2007 to 2019 while Montana's homelessness increased (18.0%). The AHAR highlighted the fact that Montana has the highest rate of unsheltered veterans in the nation (19.0%), and that Montana has experienced the largest increase in the number of chronically homeless individuals nationally, more than doubling at a staggering 134.0%. The 2019 Montana PIT Homeless Survey counted 1,357 homeless persons, including 410 homeless individuals belonging to a family with children, 8 unaccompanied homeless youth, and 939 homeless adults. Of the 1,357 homeless persons counted, 228 are considered chronically homeless. At the time of the survey, Montana's homeless population was a majority of white persons that were either a household of adults only (69.2%) or a household with adults and children (30.2%). Men represented the majority of respondents (58.4%), while women represented the majority of households with children (77.9%). Additionally, the majority of households were sheltered (74.6%) versus unsheltered (25.4%). Approximately 71% of respondents to the 2020 Montana Housing and Community Development Survey indicated that they would allocate resources to reducing homelessness.				

Narrative (Optional)

N/A

SP-30 Influence of Market Conditions – 91.315(b)

Influence of Market Conditions

Table 52 – Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant-Based Rental Assistance (TBRA)	As shown by the previous sections, the demand for rentals has increased and is expected to continue to increase throughout the course of this plan. Montana expects to see the need for TBRA to persist as the number of cost-burdened families grows. Although Montana does not currently fund TBRA with CPD funds, the 2020 Housing and Community Development Survey results indicated a high level of need for rental assistance (among all activities, rental assistance ranked third as an overall priority).
TBRA for Non-Homeless Special Needs	The Non-Homeless Special Needs populations have a variety of housing needs throughout the state. The increase in demand for and in the price of rentals will place a high need on TBRA for special need populations within the state. These increases make rentals unaffordable to many special needs populations. As stated previously, although Montana does not currently fund TBRA with CPD funds, the 2020 Housing and Community Development Survey results indicated a high level of need for rental assistance (among all activities, rental assistance ranked third as an overall priority).
New Unit Production	As shown by the Market Analysis section, housing production has not been keeping pace with demand, resulting in an increase in price. New unit production will increase the number of affordable units available to Montana households. The 2020 Housing and Community Development Survey results indicated a high level of need for new unit production, especially for rental housing (among all activities, new construction of affordable rental housing ranked first as an overall priority while new construction of affordable for-sale housing ranked second).
Rehabilitation	Montana continues to see inadequate housing production coupled with high demand for rental and homeownership units. This trend is even more pronounced in light of COVID-19. These conditions necessitate rehabilitation of existing units, both rental and homeowner, in order to meet the needs of households throughout the state. The results of the 2020 Housing and Community Development Survey also indicated a strong need for unit rehabilitation, especially for rental housing (among all activities, rental housing rehabilitation ranked fourth as an overall priority while homeowner housing rehabilitation ranked eighth).
Acquisition, including preservation	As shown in this plan, there are a number of subsidized units at risk of expiring. As the demand for affordable rental units continues to increase, the loss of these units will place additional households in need. The 2020 Housing and Community Development Survey results indicated a strong need for acquisition including preservation (among all activities, preservation of federal subsidized housing ranked seventh as an overall priority).

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

This section describes the HUD resources expected to be allocated by program throughout the state of Montana during Plan Year 1 (April 1, 2020 to March 31, 2021) and through the remainder of the Consolidated Plan period, which ends March 31, 2025. The total amount expected for the remaining 4 years of the Consolidated Plan considers a 5% decrease in funding per year.

CDBG, HOME, and HTF administrative allocation caps and expected program revenues are detailed in AP-15 Expected Resources for each year of the Consolidated Plan.

Under CDBG, HOME, and HTF, the Director of Commerce is authorized to reallocate up to 15% of each program's total allocation among grant categories, depending on the needs in the state during any given plan year. A reallocation of more than 15% of a program's total allocation or the creation or elimination of a grant category within a program is considered a substantial amendment and requires further steps as identified within the Citizen Participation Plan (**Appendix A**). See AP-15 Expected Resources for more information.

Table 53 – Anticipated Resources

Program	Source of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
		Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	Public/ Federal	$6,682,297	$0	$178,764	$6,861,061	$23,550,962	State allocation; CDBG funds matched in some grant categories by units of general local government; State funds used to meet CDBG match requirements
	Uses of Funds: Acquisition, Administration and Planning, Economic Development, Housing, Public Improvements, Public Services, and Homeowner Rehabilitation. National Objectives include Low and Moderate Income, Urgent Need, and Slums and Blight. Preference given to activities that address impacts of COVID-19.						
HOME	Public/ Federal	$3,135,479	$500,000	$0	$3,635,479	$11,050,623	State allocation; HOME funds matched by subrecipients
	Uses of Funds: Acquisition, Administration, Homebuyer Assistance, Multifamily New Construction, Multifamily Rehabilitation, and New Construction for Ownership. Preference given to activities that address impacts of COVID-19.						
HOPWA	Public/ Federal	$0	$0	$0	$0	$0	Montana only receives HOPWA competitive funds
	Uses of Funds: N/A						
ESG	Public/ Federal	$732,063	$0	$0	$732,063	$2,580,069	State allocation; ESG funds matched by subrecipients
	Uses of Funds: Financial Assistance, Homelessness Prevention, Overnight Shelter, Rapid Re-housing (Rental Assistance), Rental Assistance Services, and Street Outreach.						
HTF	Public/ Federal	$3,000,000	$0	$0	$3,000,000	$10,573,144	State allocation
	Uses of Funds: Acquisition, Administration, Multifamily New Construction, and Multifamily Rehabilitation. Preference given to activities that address impacts of COVID-19.						

Program	Source of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
		Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG CARES	Public/ Federal	$10,174,175	$0	$0	$10,174,175	$10,174,175	State allocation; CDBG CARES funds used to meet CDBG CARES program objectives with at least 70% of funds serving LMI households
	Use of Funds: For details about the CDBG CARES program, see Montana's 2019-2020 AAP as amended.						
ESG CARES	Public/ Federal	$9,266,836	$0	$0	$9,266,836	$9,266,836	State allocation; ESG CARES funds used to meet ESG CARES program objectives
	Use of Funds: For details about the ESG CARES program, see Montana's 2019-2020 AAP as amended.						

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 2020-2024 Consolidated Plan by effectively maximizing and utilizing all available funding resources to conduct housing and community development activities that will serve economically disadvantaged residents primarily residing in the non-entitlement areas of the state as well as those experiencing impacts as a result of COVID-19 repercussions.

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. Most 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 Facilities 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 5% match funding for projects. Local match sources include local costs of infrastructure installation to serve HOME-assisted units, proceeds from bond financing, private grants, 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. 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. Although the 24-month CHDO reserve commitment deadline has been waived, CDD anticipates continuing to meet that commitment.

ESG funds are frequently matched by subrecipients who provide rental assistance, transitional housing and/or supportive services through the MTCoC. A significant amount of local ESG subrecipients 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 Affordable Housing Development and Rehabilitation or Housing Stabilization Program grants, but the applicants' ability to leverage other private, local, state, or federal funds is considered when ranking a proposed project for CDBG housing grant funding.

No match is required under the HTF Program, which provides a much-needed source of leveraging for other funding programs aimed at the preservation and expansion of rental housing stock in Montana.

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

The State of Montana does not anticipate that any publicly owned land or property will be used to address the needs identified in this Consolidated Plan. Most 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.

Discussion

Program leveraging for specific program years is discussed in AP-15 Expected Resources.

SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Commerce is the lead government entity responsible for Consolidated Plan activities funded through CDBG, CDBG CARES, HOME, and HTF. DPHHS is the lead government entity responsible for Consolidated Plan activities funded through ESG and ESG CARES.

Table 54 – Institutional Delivery Structure

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
State of Montana	State government	Administration of CDBG, CDBG CARES, HOME, HTF, ESG, and ESG CARES programs and grant awards. **Affordable Housing** [x] Ownership [x] Rental [ ] Public Housing [x] Homelessness [x] Non-homeless special needs **Community Development** [x] public facilities [x] neighborhood improvements [x] public services [x] Economic Development [x] Planning	Statewide
Montana cities and towns	Local government	Administration of CDBG-, CDBG CARES-, HOME-, and HTF-funded projects serving residents of the jurisdiction. **Affordable Housing** [x] Ownership [x] Rental [ ] Public Housing [x] Homelessness [x] Non-homeless special needs **Community Development** [x] public facilities [x] neighborhood improvements [x] public services [x] Economic Development [x] Planning	Within municipal boundaries
Montana counties	Local government	Administration of CDBG-, CDBG CARES-, and HOME-funded projects serving residents of the jurisdiction. **Affordable Housing** [x] Ownership [x] Rental [ ] Public Housing [x] Homelessness [x] Non-homeless special needs **Community Development** [x] public facilities [x] neighborhood improvements [x] public services [x] Economic Development [x] Planning	Within county boundaries or within municipal boundaries if joint administration of project serving residents of both the municipality and unincorporated areas of a county

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Certified Regional Development Organizations	Private, nonprofit corporation	Administration of CDBG-funded projects. **Affordable Housing** [ ] Ownership [ ] Rental [ ] Public Housing [ ] Homelessness [ ] Non-homeless special needs **Community Development** [ ] public facilities [x] neighborhood improvements [ ] public services [x] Economic Development [x] Planning	Within 1 of 11 regional areas across Montana
Community Housing Development Organizations (CHDOs)	Private, nonprofit corporation	Administration of HOME and HTF grants. **Affordable Housing** [x] Ownership [x] Rental [ ] Public Housing [x] Homelessness [x] Non-homeless special needs **Community Development** [ ] public facilities [ ] neighborhood improvements [ ] public services [ ] Economic Development [ ] Planning	Within area certified as part of grant application
Tribal housing authorities	Public housing authority	Administration of HOME and HTF grants for non-tribal housing. **Affordable Housing** [x] Ownership [x] Rental [ ] Public Housing [x] Homelessness [x] Non-homeless special needs **Community Development** [ ] public facilities [ ] neighborhood improvements [ ] public services [ ] Economic Development [ ] Planning	Within tribal nation boundaries

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Human Resource Development Councils	Nonprofit community action agency	Administration of HOME, HTF, ESG, and ESG CARES grants. **Affordable Housing** [x] Ownership [x] Rental [ ] Public Housing [x] Homelessness [x] Non-homeless special needs **Community Development** [ ] public facilities [ ] neighborhood improvements [ ] public services [ ] Economic Development [ ] Planning	Within 1 of 12 regional districts across Montana

Assess of Strengths and Gaps in the Institutional Delivery System

The mission of Commerce is to foster community-led diversification and sustainability of a growing economy; maintain and improve infrastructure, housing, and facilities; and promote Montana's positive national and international image. Through its employees, public and community partners, and media contacts, Commerce works to:

- Improve the state's economy through business creation, expansion, retention, and diversification of the economic base;
- Provide technical assistance and training for Montana's entrepreneurs, businesses, and their employees in partnership with local governments and local/regional development groups;
- Enhance the growth of the economy through promotion and marketing of tourism development;
- Promote access to new foreign and domestic markets for Montana goods and services;
- Provide financing for homeownership and rental assistance;
- Improve infrastructure and housing by providing grants and technical assistance;
- Manage the investments of government funds; and
- Provide fair and equal treatment of employees and customers.

The mission of DPHHS is to improve and protect the health, well-being, and self-reliance of all Montanans. DPHHS works to:

- Increase economic security and self-sufficiency of families; and
- Provide essential services and linkages to community resources.

Commerce and DPHHS have forged strong relationships with the Montana League of Cities and Towns, the Montana Association of Counties, the Montana Economic Developers Association, housing organizations, entitlement communities, private housing developers, and private sector businesses to promote economic, community, and affordable housing development statewide. These organizations and agencies have created partnerships with local government entities, social service agencies, benefit providers, faith-based organizations, philanthropic groups, and private industry leaders to deliver housing, job, and community services throughout the state.

Experienced Commerce and DPHHS staff are responsible for the award and administration of federal and state funds to eligible entities. While all staff take advantage of nationally recognized training, two Commerce staff are certified Housing Development Finance Professionals, four Commerce staff are actively working on certification to become Economic Development Finance Professionals, and one Commerce staff is certified with the American Institute of Certified Planners. Additionally, Commerce employs a land use attorney.

Gaps in the institutional delivery system exist primarily due to funding limitations that are outside the control of the State. CDBG, HOME, HTF, and ESG resources are not adequate to meet the needs of Montanans of low to moderate income, with special needs, or experiencing homelessness. Areas of opportunity exist for increased collaboration to ensure that services are delivered. The State seeks to actively engage the public and private sectors in broad discussions regarding the economic, social, environmental, and health needs and opportunities in Montana.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Table 55 – Homeless Prevention Services Summary

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services	X		
Supportive Services			
Alcohol and Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	
Other			
Other			

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

Homeless persons living with HIV receive services and referrals through the Ryan White HIV/AIDS Program, Open Aid Alliance, and District 7 HRDC which offers case management and housing assistance through HOPWA. Once housing and healthcare needs have been met, employment services are encouraged.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Community partners working together to provide services—including the District 7 HRDC and Open Aid Alliance, both of which receive funding from a competitive HOPWA grant—are a strength of the service delivery system. There continue to be significant gaps in the service delivery system for people living with HIV, such as:

- The lack of temporary shelter appropriate for people with compromised immunity. The majority of our clients who are at-risk of homelessness end up in emergency hospital care with serious medical issues. The limited funding for limited hotel stays is not enough time to secure housing.
- The lack of stable housing availability for people in difficult financial circumstances.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Affordable Housing Preservation and Construction: The State will continue to work to preserve existing and construct new affordable housing by increasing collaboration between and within Commerce and DPHHS; and between the State and its local government, federal government, nonprofit, and private sector partners.

CDD manages the HOME and HTF programs to rehabilitate existing and construct new affordable housing. CDD meets regularly with Montana Housing staff to share information regarding projects the divisions have in common. To the extent possible, the divisions align requirements and share monitoring activities. Commerce and DPHHS coordinate with service providers to reduce barriers for financing permanent affordable housing for those experiencing homelessness. CDD remains active in the annual Housing Partnership Conference to maintain and grow relationships with the nonprofit and private sector to monitor trends in housing needs and help identify and solve barriers to affordable housing. Commerce will continue to provide fair housing information, housing education, and homebuyer counseling in partnership with the HRDCs and CHDOs across the state.

Community Planning: The State has accomplished major strides in increasing funding and technical assistance for communities to engage in comprehensive, strategic, and preliminary design planning for community, housing, economic development, flood prevention, and infrastructure projects. CTAP, within CDD, continues to provide technical assistance in the areas of land use planning and community development to communities across the state. As part of those services, assistance is provided for comprehensive, strategic, and preliminary infrastructure design planning. Targeted assistance will be provided to communities affected by the decline in the coal industry and to communities with substantial population changes resulting from COVID-19 and the rise in teleworking. CTAP has assisted numerous local counties, cities, and towns with adoption of comprehensive growth policies, zoning for

temporary workforce housing, annexation policies, preliminary engineering reports for increasing capacity in water and wastewater systems, and updated subdivision regulations. Efforts to assist communities in prioritizing and funding critical community service facilities, housing, public infrastructure, and economic development projects are ongoing. CTAP continues to provide training and education statewide to local governments, nonprofits, and the private sector on topics related to community planning.

Improving and Sustaining Vital Public Infrastructure: The State is keenly aware of the need for improving and sustaining vital public infrastructure, and the importance of safe, efficient infrastructure. During the 2019 Legislative Session, House Bill 5 and House Bill 652 were put forward to fund and authorize capital and infrastructure projects throughout the state. Infrastructure needs persist statewide, and the State continues to use existing state and federal funding to address critical needs.

Economic Revitalization: The State continues to work to revitalize Montana's economy and local business districts by increasing collaboration within Commerce; and between the State and its local government, federal government, nonprofit, and private sector partners.

CDD manages the CDBG-ED program, offering a "one-stop" approach to grant opportunities for economic development, historic preservation, and downtown revitalization. CDD meets regularly with the Montana Office of Tourism and Business Development within Commerce, the Montana Economic Developers Association, and the Certified Regional Development Corporations to coordinate potential job creation, workforce training, and revolving loan fund projects with eligible CDBG-ED grants, and to monitor economic data collectively in order to address needs as they arise. In addition, Commerce is actively involved in the annual Montana Downtown Conference, MEDA Conference, and other state and regional meetings to maintain and grow relationships with the nonprofit and private sectors to monitor trends in economic development and help collectively identify and solve barriers to economic revitalization in communities across Montana.

Reducing Homelessness: The State continues to work toward creating community and statewide partnerships, with emphasis on providing "one-stop" referral services. The State and the MTCoC, working with homelessness staff, have adopted a strategic plan for dealing with homelessness, with the intent of reducing or eliminating the length of time any person must experience homelessness.

<u>Family Strategies:</u>

- Reallocate MTCoC funded transitional housing beds to Rapid Re-housing or Permanent Supportive Housing
- Prioritize ESG for Rapid Re-housing of families
- Dedicate or prioritize use of Temporary Assistance for Needy Families (TANF) funds for Rapid Re-housing of TANF-eligible families
- Increase availability of PSH beds by shortening lengths of stay

<u>Individual Strategies:</u>

- Reallocate MTCoC-funded transitional housing beds (current inventory of 255) to Rapid Re-housing or Permanent Supportive Housing
- Dedicate PSH turnover beds for chronic homeless (200 non-CH beds available)
- Increase availability of PSH beds by shortening lengths of stay
- Increase availability of PSH beds by prioritizing HCV for PSH Graduates
- Prioritize ESG for Rapid Re-housing of individuals

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

Table 56 presents Montana's goals for all 5 years of the Consolidated Plan period (2020-2024). See **Table 58** in AP-20 for Montana's goals for Plan Year 1 of the 5-year Consolidated Plan period.

Table 56 – Goals Summary

#	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve and Construct Affordable Housing	2020	2024	Affordable Housing	Statewide	Affordable Housing Preservation and Construction	CDBG: $4,000,000 HOME: $11,500,000 HTF: $10,000,000	Rental Units Constructed: 60 Household Housing Units Rental Units Rehabilitated: 130 Household Housing Units Homeowner Housing Added: 10 Household Housing Units Homeowner Housing Rehabilitated: 15 Household Housing Units Direct Financial Assistance to Homebuyers: 250 Households Assisted
		Funding and outcome goals are 5-year estimates. The State of Montana will use CDBG, HOME, and HTF funds to support affordable housing activities that benefit low to moderate income persons.						
2	Plan for Communities	2020	2024	Non-Housing Community Development	Statewide	Community Planning	CDBG: $2,500,000	Other: 75 Local Governments Assisted
		Funding and outcome goals are 5-year estimates. The State of Montana will use CDBG funds to help communities engage in various types of planning, including comprehensive community development, housing, public infrastructure, business, downtown revitalization, flood prevention, and preliminary project design. A wide variety of activities will be funded that primarily benefit low to moderate income persons throughout the state.						
3	Improve and Sustain Public Infrastructure	2020	2024	Non-Housing Community Development	Statewide	Improving and Sustaining Vital Public Infrastructure	CDBG: $13,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5,000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 100 Households Assisted
		Funding and outcome goals are 5-year estimates. The State of Montana will use CDBG funds to improve existing and construct new public water, wastewater, and storm drain infrastructure that primarily benefits low to moderate income persons throughout the state.						
4	Revitalize Local Economies	2020	2024	Non-Housing Community Development	Statewide	Economic Revitalization	CDBG: $10,000,000	Jobs Created/Retained: 250 Jobs Businesses Assisted: 20 Businesses Assisted Façade Treatment/Business Building Rehabilitation: 5 Businesses
		Funding and outcome goals are 5-year estimates. The State of Montana will use CDBG funds to create jobs, expand businesses, and revitalize historic downtown business districts. A wide variety of activities will be funded that primarily benefit low to moderate income persons through the state.						

#	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Reduce Homelessness	2020	2024	Homeless	Statewide	Reducing Homelessness	CDBG: $2,500,000 HOME: $2,500,000 HTF: $3,500,000 ESG: $3,500,000	Tenant-Based Rental Assistance/Rapid Rehousing: 1,000 Households Assisted Homeless Person Overnight Shelter: 400 Persons Assisted Homeless Prevention: 2,400 Persons Assisted Housing for Homeless Added: 100 Household Housing Units
		Funding and outcome goals are 5-year estimates. The State of Montana will use CDBG, HOME, HTF, and ESG funds to provide shelter and services for homeless persons and persons at risk of homelessness. Activities may include construction, rehabilitation, and direct assistance to serve this clientele throughout the state.						

Goal Descriptions

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

CDBG, HOME, and HTF resources will be used to provide affordable housing to LMI households throughout the 5-year period. Based on the estimates above, each year approximately 150 LMI households will be provided housing through new construction and rehabilitation activities, 30 LMI households will receive direct financial assistance for home purchase, and 20 LMI households experiencing homelessness will be housed through housing for homeless added.

Through the ESG Program, approximately 350 LMI persons will be assisted every year under rapid re-housing. In addition, under CDBG and ESG, approximately 80 LMI persons will utilize overnight shelter annually.

SP-50 Public Housing Accessibility and Involvement – 91.315(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not applicable.

Activities to Increase Resident Involvements

Not applicable.

Is the public housing agency designated as troubled under 24 CFR part 902?

Not applicable.

Plan to remove the 'troubled' designation

Not applicable.

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

Several barriers to affordable housing development, housing choice, and maintained residency in housing were identified in the Needs Assessment, Market Analysis, 2018 Fair Housing Survey (**Appendix B**), and 2020 Housing and Community Development Survey (**Appendix B**).

Participants in Commerce's housing focus groups (**Appendix C**) outlined several barriers to affordable housing development, including:

- Capacity challenges at all levels (from the State to grantees and partners), especially in the midst of COVID-19);
- Cumbersome grant processes and unpredictable grant timelines (e.g., grant application process and funding cycle);
- Insufficient program funding, which is exacerbated by the high and rising costs of building and infrastructure; and
- Design constraints.

The 2018 Fair Housing Survey had 691 respondents. Takeaways from the survey are as follows.

- Affordability and unit size were the most important factors in housing choice for both renters and owners.
- 36% of respondents indicated they had witnessed housing discrimination. Level of income was the primary grounds for perceived discrimination, followed by race and criminal background. Source of income, familial status, and disability were also listed as principal grounds of perceived discrimination.
- 66% and 10% of respondents who witnessed discriminatory behavior said that perceived discrimination resulted from actions taken by rental owners/managers and PHA employees, respectively.
- More than 24% of respondents indicated they wouldn't know what to do if they experienced or witnessed discrimination, and a staggering 85% of respondents said they were not familiar with or were only somewhat familiar with fair housing laws.

The 2020 Housing and Community Development Survey had 303 respondents; approximately 200 of these indicated that their community or organization faced barriers to decent, affordable housing. Barriers cited are as follows.

- Insufficient decent, affordable, and accessible housing stock—especially for persons with disabilities, seniors, the workforce, and individuals transitioning out of institutional and correctional facilities.
- Housing markets that price out extremely low, low-, and moderate-income families and service workers, especially housing markets in resort communities where short-term rentals are common and luxury homes are prevalent.
- Land availability and cost; development costs.
- Restrictive building codes and zoning regulations.
- Funding and financing for decent, affordable housing.
- Lack of supportive services and case management for special needs populations.
- Lack of public transportation for workers.
- Underutilized tenant-based rental subsidies (vouchers) resulting from limited housing options and uncooperative landlords.

- Inadequate, coordinated planning efforts.
- Developers not incentivized to develop in rural areas.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

For CDBG, HOME, or HTF projects funded, Commerce requires each grantee to develop an Affirmatively Fair Housing Marketing Plan (AFHMP). An approved AFHMP is one element of the special conditions of Commerce's contracts with grantees and staff monitor for compliance during CDBG, HOME, and HTF project visits.

A comprehensive discussion of barriers to affordable housing, and additional information on specific strategies identified to remove or ameliorate such barriers, can be found in Section AP-75 Barriers to Affordable Housing of this Consolidated Plan. Annually, AAPs will propose actions to be taken while CAPERs will report actual, completed actions for specific program years.

Additional considerations related to the amelioration of barriers are listed as follows:

Cost of land: According to DOR[82], the statewide market value of residential property has increased each biennium since 2015. From 2015 to 2019, the residential improvements market value increased 32% while the residential land market value increased 24%. Continued increases are anticipated in part due to high demand in the market for both primary and secondary homes, especially from out-of-state buyers with high purchasing power.

Cost of materials: Raw material prices have been increasing over the past several years. Early increases can be attributed to a strong economic climate and trade disputes. More recently, increases are attributable to uncertainty and instability in the market resulting from COVID-19.

Lumber accounts for upwards of 5% of construction costs. Lumber production in Montana declined sharply from 2004 to 2010 (985 million board feet to 503 million board feet) and has been relatively stagnant through 2018 (480 million board feet in 2017). Lumber prices have been somewhat volatile in the past decade, with the most rapid increases experienced in 2017 and 2018.[83]

Cost of labor: According to the U.S. Bureau of Labor Statistics[84], following the great recession (2007 to 2009) and the preceding housing bubble, employment for most construction occupations declined, seeing more losses than many other occupations. Since 2012, many of the hardest-hit construction occupations have begun recovering. As a result, most construction occupations have growth rates that exceed the 10.8% average for all occupations. In fact, 2 of the 10 fastest growing occupations (insulation workers, mechanical; helpers—brickmasons, blockmasons, stonemasons, and tile and marble setters) are expected to be in construction.

The construction industry employed roughly 6,092,200 workers nationally in 2012. Construction industry jobs are projected to increase to over 7,300,000 by 2022 (an increase of more than 21%).

[82] https://mtrevenue.gov/publications/biennial-reports/
[83] http://bber.umt.edu/events/2019Pres.asp
[84] https://www.bls.gov/iag/tgs/iag236.htm; https://www.bls.gov/opub/mlr/2013/article/occupational-employment-projections-to-2022.htm

Cost of Building Codes and City Planning Rules and Regulations: Land use regulations are a necessary part of ensuring the health and safety of individuals and communities. Zoning and subdivision regulations are meant to efficiently guide development in communities while building codes are designed to ensure that home construction is safe.

The most important aspect of the relationship between land use regulation and housing affordability is the type and form of regulation. Traditional "exclusionary" zoning can limit the supply and accessibility of affordable housing, thereby raising home prices by excluding lower income households. Exclusionary zoning is typically considered zoning that has the effect of keeping certain population groups, or in some cases, additional population of any kind, out of a community or neighborhood. Techniques such as large-lot zoning, high floor area or minimum residential floor area requirements, which increase housing costs, have been challenged for their potential exclusionary effects. Well-crafted land use policies can break the chain of exclusion by incorporating policies that increase housing densities, encourage a mix of housing types, and promote regional fair share housing or other inclusionary housing elements.

Montana has traditionally employed minimal land use regulations at the local level; outside of the incorporated communities, most regulations serve the purpose of limiting the subdivision of property to create new lots. Some communities have tried to address neighborhood concerns about higher density developments by establishing design standards and more resident-participatory review processes. As local Montana communities recognize the need for more affordable housing, each community has to balance the public interest in limiting increased housing costs while protecting the public health, safety, welfare and quality of life through land use regulations.

Impact Fees: The adoption of impact fees is an alternative available to local governments for generating the revenue necessary to accommodate new development. Impact fees were specifically authorized by the Montana Legislature in 2005 to help local governments pay for improvements, land, and equipment necessary to increase or improve the service capacity of public facilities and services (including water, wastewater, transportation, storm water, flood control, police, emergency medical rescue, fire protection, or other public facilities). Several communities in Montana have adopted impact fees for funding one or more facilities or services, including Bozeman, Polson, Hamilton, Belgrade, Bainville, Kalispell, Missoula, Whitefish, Circle, Miles City and Sidney.

Financing Barriers: Affordable financing was identified as a crucial need during one of the three housing focus groups Commerce conducted in November 2020. According to one source[85], following the great recession (2007 to 2009), it has become more difficult for low-income households to buy homes, in part because of shifting notions of "creditworthiness." The median credit score for purchasing a home is now more than 40 points higher than it was prior to the recession. The 10th percentile, which is deemed the "lower bound of creditworthiness to qualify for a mortgage" is currently 657; before the recession, it was under 600.[86] In addition, scores are often determined based on existing debt, but not on-time rent and utility payments. Furthermore, households without traditional employment, such as "gig" workers, have difficulty getting a proper assessment of income and thus have challenges securing available financing. These barriers to affordable housing disproportionately affect low- to moderate-income families. So, despite the fact that interest rates are historically low, good financing continues to be elusive for many families.

[85] https://www.vox.com/22264268/covid-19-housing-insecurity-housing-prices-mortgage-rates-pandemic-zoning-supply-demand
[86] https://www.urban.org/sites/default/files/publication/103273/housing-finance-at-a-glance-a-monthly-chartbook-november-2020_0.pdf

In an effort to ameliorate financing barriers, MH administers loan and mortgage programs that offer alternatives to conventional loan products.

SP-60 Homelessness Strategy – 91.315(d)

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

Montana divides itself into 12 districts to participate annually in the national PIT 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 significant 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 HUD, with the goal of supporting the transition of homeless individuals into stabilized self-sufficiency in affordable housing. It is important to note that the MTCoC feels that multiplying a single night's data into an annual estimate does not necessarily result in an accurate representation.

Addressing the emergency and transitional housing needs of homeless persons

Montana encourages efforts to provide shelter and other basic needs to people who are currently homeless 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 experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Table SP-1 shows the length of time since those surveyed during the 2019 PIT count had a home. In other words, it indicates how long respondents had experienced homelessness at the time of the survey. Of note, the majority of respondents (242 or 24%) indicated that it had been 2 years or more since they had a home. Unfortunately, research indicates that the longer homelessness is experienced, the more difficult and costly stabilization and re-housing is.

Table SP-1 – Length of Homelessness

Length of time since had home	Child and Adult Household		Child Only Household		Adult Only Household		Chronically Homeless		Veteran		Un-Accompanied Youth		HIV	
Less than 1 mo	23	12%	1	1%	163	87%	14	7%	29	16%	22	12%	2	1%
1 mo	31	19%			133	81%	3	2%	27	16%	13	8%	1	1%
3 mo	25	20%	2	2%	99	79%	5	4%	28	22%	13	10%		
6 mo	28	20%	2	1%	109	78%	8	6%	32	23%	7	5%		
1 yr	18	14%	1	1%	114	86%	41	31%	30	23%	7	5%		
2 yrs or more	10	4%	1	0%	231	95%	115	48%	55	23%	12	5%	1	0%

Length of time since had home	Child and Adult Household		Child Only Household		Adult Only Household		Chronically Homeless		Veteran		Un-Accompanied Youth		HIV	
Missing/NA			1	14%	6	86%	1	14%	3	43%	2	29%		
Not homeless	1	9%			10	91%			1	9%				
Total	136	13%	8	1%	865	86%	187	19%	205	20%	76	8%	4	0%

Data Source: 2019 Montana Homeless Survey (primary respondents only)

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

DPHHS works with the MTCoC to leverage resources and provide increased and coordinated services to homeless households across the state. DPHHS aligns its strategy for reducing and ending homelessness with the MTCoC districts. 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 on 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. Funded activities include rental assistance, financial assistance of rental application fees, security and utility deposits and payments, case management, housing search and support for toll free telephone referral hotlines for domestic abuse; referral to mainstream resources; assistance to shelters for victims of domestic and sexual violence, youth homes, and food banks. All HRDCs submit work plans, budgets, and reports outlining which of the allowable activities will be undertaken.

SP-65 Lead based paint Hazards – 91.315(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The State of Montana complies with the HUD LBP requirements established in 2000. As shown in the Market Analysis, about 53% of all owner-occupied units and 61% of all renter-occupied units in Montana are at risk of containing LBP. Projects involving structures built prior to 1980 are considered to have the potential for LBP and consistent procedures have been developed to ensure compliance with federal regulations.

Of the housing at risk of containing LBP, approximately 6% and 10% of owner- and renter-occupied units, respectively, have children present. In 2012, the Center for Disease Control recommended that physicians and parents take action steps for children with elevated lead levels greater than or equal to 5 ug/dL. The DPHHS Healthy Homes and Lead Poisoning Prevention Program conducted a 2012 field study in 11 counties in Montana, using Medicaid enrollment to identify and test children from 1 to 5 years old. Of the nearly 600 Montana children tested 3% had levels greater than or equal to 5 ug/uL; 25% of all children tested had levels higher than 1 ug/uL.

The State of Montana supports rehabilitation and construction activities to ensure that households, particularly those with children, benefiting from federal housing programs are safe from LBP hazards. Both Commerce and DPHHS provide education and information on LBP hazards to parents, families, healthcare providers, grant recipients, and contractors. Commerce requires that any contractor or subcontractor engaged in renovation, repair, or painting activities is certified and uses lead-safe work practices, as required by the U.S. Environmental Protection Agency. If rehabilitation or homebuyer assistance is funded by CDBG, HOME, or HTF, and the unit funded was built prior to 1980, LBP risks must be assessed. If a unit has LBP that is chipping, peeling, or deteriorating, it must be remediated or removed during rehabilitation or prior to securing funds for homebuyer assistance. For many projects, CDBG, HOME, and HTF funds can be used to assist with the cost of LBP testing and remediation.

In addition, UPCS/HQS inspections are performed annually at HOME, HTF, Section 8, and other public rental properties throughout the state. UPCS/HQS inspections are also conducted on all homes purchased with HOME assistance prior to the commitment of HOME funds. State staff conducting UPCS inspections complete UPCS training as well as HUD's online Lead-Based Paint Visual Assessment Training.

How are the actions listed above integrated into housing policies and procedures?

In the adopted CDBG Housing and HOME/HTF grant application guidelines, applicants are required to document that proposed rehabilitation activities have been assessed for LBP or lead water service lines; that the applicant has the resources to ensure that certified LBP inspectors and contractors are available to accomplish the proposed activities; and that the cost and design of the proposed activity takes LBP removal and remediation into account. Applicants for CDBG and HOME/HTF funding are required to certify that they accept all program requirements, including compliance with all state and federal LBP requirements and regulations. Additionally, HTF projects require a qualified professional to certify that the assisted project only uses lead-free pipes, solder, and flux.

Commerce requires that Preliminary Architectural Reports (PARs) funded with state or federal funding, or submitted in support of a grant application for any state or federal funding, meet Commerce's PAR standards, which have been adopted as part of the requirements for CDBG, HOME, and HTF grant applications. These standards, among other things, require every PAR to describe all concerns, deficiencies, compliance issues, and relevant regulations related to LBP, evaluate the existence of LBP in any existing facilities, and describe all mitigation measures that will be implemented to remediate any LBP.

Commerce's Tenant-Based Housing Choice Voucher Program Administrative Plan requires all HCV rental units to meet HQS, including LBP assessment, disclosure, testing, remediation, and on-going unit maintenance as applicable.

SP-70 Anti-Poverty Strategy – 91.315(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The State of Montana, in coordination with nonprofit organizations and the private sector, can ensure individuals and families have pathways out of poverty by supporting local and regional efforts to increase household incomes and provide affordable housing options. All of the strategies and priorities identified in this Consolidated Plan target the improvement of economic conditions of Montanans of low to moderate income, from the rehabilitation and new construction of affordable units, homebuyer assistance, and temporary shelter services to investment in compact, walkable development where

efficiencies of public infrastructure, community services, and employment centers encourage healthy, vital, and resilient communities.

Appendix F discusses poverty in Montana over the last two decades and includes the state's poverty rate as well as its geographic distribution.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The priority needs, program goals, policies, procedures, and guidelines for the CDBG, HOME, HTF, and ESG programs, as well as other state programs that fund affordable housing, job creation, and community services, are all in alignment in addressing the impacts of poverty and increasing the quality of life and economic prosperity of Montanans of lower incomes.

Montana is committed to utilizing employment as the primary strategy for poverty reduction. The state has a well-coordinated employment and training system, which ensures that resources for advancement through employment, such as the Workforce Investment Act, TANF, and other state resources such as higher education, are available to low-income families. The Work Readiness Component provides employment and training services to individuals receiving cash assistance. Administrators of these programs meet regularly to ensure coordination and results.

The State provides a series of work support programs to stabilize families as they increase their skills and seek better employment. These supports include TANF, energy assistance, health care, childcare, housing assistance and advocacy. SNAP (Supplemental Nutrition Assistance Program, formerly the Food Stamp Program) provides benefits to eligible families to supplement their food budget and increase their ability to purchase healthy foods. SNAP Nutrition Education, operated jointly with Montana State University, teaches participants to use their food stamp benefits wisely. The Healthy Montana Kids program provides health coverage to children of households of lower incomes, and Medicaid coverage has been expanded and is provided under the Affordable Care Act.

Montana's minimum wage has increased steadily over the past several years. It is currently $8.75, which is higher than the federally mandated minimum wage of $7.25.

SP-80 Monitoring – 91.330

Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The goals of the Consolidated Plan will be monitored annually as required by the CAPER, which is submitted to HUD at the conclusion of each program year. Monitoring consists of:

- HOME- and HTF-funded projects (as applicable) are monitored annually to determine compliance with housing codes and applicable HUD regulations and Commerce policies. Project monitoring is based on a guide found in the HOME Grant Administration Manual. Key issues include assessment of affirmative marketing actions, outreach to minority and women owned businesses, data on the amount and use of program income, number of projects, and eligibility of tenants and homebuyers, rent levels, purchase prices, and compliance with subsidy limits. Following the monitoring visit, staff provides a written letter to the grantee indicating any issues or findings identified. The grantee must respond to any issues or findings.

- Homebuyer and rental grantees provide annual certifications to the HOME Program. Certifications require homebuyer grantees to verify either that homes are continuing to be used as the principal residences of participants, or if transfer of the property has occurred, that program income has been recaptured and accounted for. All rental projects must certify that inspections for HQS are complete and that affordability requirements regarding income and rent limits have been met. In addition, each property's financials are reviewed.
- HOME-funded rental projects receive onsite visits every 1 to 3 years, depending on the results of a risk analysis performed by staff after each onsite visit. These onsite visits allow staff to verify that tenant income certifications, rental agreements, rent limits, and inspection results meet HUD and Commerce requirements. Staff also review the facility's condition to ensure it remains safe, decent, and sanitary.
- CDBG-funded projects receive periodic onsite monitoring visits during the plan year. Program staff monitor the critical elements of each project at least once. Staff completes an extensive checklist, reviewing each project element for compliance with all applicable federal, and state program requirements. Following the monitoring visit, staff issue a formal letter to the chief elected official of the local government reporting on the monitoring visit, noting any findings as may be applicable, and asking the local government to respond promptly.
- CDBG staff monitor all projects through regular contacts with the local project manager and written quarterly and drawdown progress reports. These reports provide information and updates concerning project activities and progress on objectives from start-up through closeout of the project.
- DPHHS provides onsite monitoring of the ESG Program via regularly scheduled monitoring visits by program staff, using a monitoring tool. Staff review 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.

Annual Action Plan

Expected Resources

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

Introduction

This section describes the HUD resources expected to be allocated by program throughout the state of Montana during Plan Year 1 (April 1, 2020 to March 31, 2021) and through the remainder of the Consolidated Plan period, which ends March 31, 2025. The total amount expected for the remaining 4 years of the Consolidated Plan considers a 5% decrease in funding per year.

CDBG general planning and 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 general planning and administrative funds will not exceed $1,336,459 for Plan Year 1. The use of administrative funds for the state will not exceed 3% plus $100,000. The balance of general planning and administrative funds will go to units of general local government for general planning and administrative costs to support the completion of project activities. General planning activities are eligible planning activities under Section 105(a)(12) of the Housing and Community Development Act of 1974. Any administrative funds not awarded to grantees for general planning or administrative costs will be redirected to project costs for completing activities. No more than 15% of the CDBG funds, including program income, after administrative funds are accounted for, will be used toward Urgent Need. CDBG planning funds that are used for standalone planning-only activities will meet either the Low and Moderate Income or Slums and Blight National Objectives.

HOME administration allocations are capped at 10% of the annual HOME allocation in addition to eligible program income received during the program year. The amount of federal HOME administrative funds will not exceed $313,547 for Year 1. Revenue received during a project's period of affordability is considered recaptured and will not be used for administration.

HTF administration allocations are capped at 10% of the annual HTF allocation. The amount of federal HTF administrative funds will not exceed $300,000 for Year 1. The use of administrative funds will not exceed 10% for state HTF staff and grantee administrative costs to support the completion of project activities.

Expected revenues for CDBG include repayments for funding loaned to businesses that create job opportunities for Montanans of low to moderate income, as well as income attributable to the Neighborhood Stabilization Program. Expected revenues for HOME include recaptured funds and program income generated by the HOME Homebuyer Assistance Program. The amount of program income received in any given plan year varies depending on the housing market, interest rates and the general economy.

To achieve the most effective and efficient use of CDBG funds, the Director of Commerce may reallocate up to 15% or $1,002,345 of the total CDBG allocation among grant categories, depending on 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, is considered a substantial amendment to this AAP and would require further steps as identified within the Citizen Participation Plan (**Appendix A**). Reallocations may also be made to any remaining balances within a grant category within the last 3 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 Commerce may reallocate up to 15% or $470,322 of the total HOME allocation among HOME Housing Development Program and HOME Homebuyer Assistance Program grant categories, depending on 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 is considered a substantial amendment to this AAP and would require further steps as identified within the Citizen Participation Plan (**Appendix A**). Reallocations may also be made of any remaining balances within a grant category within the last 3 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 $470,322, of the CHDO set-aside requirement has been obligated.

The HTF allocation may also be moved between projects that serve those experiencing homelessness and other projects. Reallocations of up to 15% or $450,000 may be authorized by the Director of Commerce.

Table 57 describes the HUD resources to be used across the state to achieve the objectives of each program.

Table 57 – Expected Resources – Priority Table

Program	Source of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
		Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	Public/ Federal	$6,682,297	$0	$178,764	$6,861,061	$23,550,962	State allocation; CDBG funds matched in some grant categories by units of general local government; State funds used to meet CDBG match requirements
	Uses of Funds: Acquisition, Administration and Planning, Economic Development, Housing, Public Improvements, Public Services, and Homeowner Rehabilitation. National Objectives include Low and Moderate Income, Urgent Need, and Slums and Blight. Preference given to activities that address impacts of COVID-19.						
HOME	Public/ Federal	$3,135,479	$500,000	$0	$3,635,479	$11,050,623	State allocation; HOME funds matched by subrecipients
	Uses of Funds: Acquisition, Administration, Homebuyer Assistance, Multifamily New Construction, Multifamily Rehabilitation, and New Construction for Ownership. Preference given to activities that address impacts of COVID-19.						
HOPWA	Public/ Federal	$0	$0	$0	$0	$0	Montana only receives HOPWA competitive funds
	Uses of Funds: N/A						
ESG	Public/ Federal	$732,063	$0	$0	$732,063	$2,580,069	State allocation; ESG funds matched by subrecipients

Program	Source of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
		Annual Allocation	Program Income	Prior Year Resources	Total		
	Uses of Funds: Financial Assistance, Homelessness Prevention, Overnight Shelter, Rapid Re-housing (Rental Assistance), Rental Assistance Services, and Street Outreach.						
HTF	Public/ Federal	$3,000,000	$0	$0	$3,000,000	$10,573,144	State allocation
	Uses of Funds: Acquisition, Administration, Multifamily New Construction, and Multifamily Rehabilitation. Preference given to activities that address impacts of COVID-19.						
CDBG CARES	Public/ Federal	$10,174,175	$0	$0	$10,174,175	$10,174,175	State allocation; CDBG CARES funds used to meet CDBG CARES program objectives with at least 70% of funds serving LMI households
	Use of Funds: For details about the CDBG CARES program, see Montana's 2019-2020 AAP as amended.						
ESG CARES	Public/ Federal	$9,266,836	$0	$0	$9,266,836	$9,266,836	State allocation; ESG CARES funds used to meet ESG CARES program objectives
	Use of Funds: For details about the ESG CARES program, see Montana's 2019-2020 AAP as amended.						

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 2020-2024 Consolidated Plan during Plan Year 1 by effectively maximizing and utilizing all available funding resources to conduct housing and community development activities that will serve economically disadvantaged residents primarily residing in the non-entitlement areas of the state as well as those experiencing impacts as a result of COVID-19 repercussions.

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. Most 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 Facilities 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 5% match funding for projects. Local match sources include local costs of infrastructure installation to serve HOME-assisted units, proceeds from bond financing, private grants, 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. 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. Although the 24-month CHDO reserve commitment deadline has been waived, CDD anticipates continuing to meet that commitment.

ESG funds are frequently matched by subrecipients who provide rental assistance, transitional housing and/or supportive services through the MTCoC. A significant amount of local ESG subrecipients 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 Affordable Housing Development and Rehabilitation or Housing Stabilization Program grants, but the applicants' ability to leverage other private, local, state, or federal funds is considered when ranking a proposed project for CDBG housing grant funding.

No match is required under the HTF Program, which provides a much-needed source of leveraging for other funding programs aimed at the preservation and expansion of rental housing stock in Montana.

If appropriate, describe publicly 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 this AAP. Most 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.

Discussion

Program leveraging for the 5-year Consolidated Plan period is discussed in SP-35 Anticipated Resources.

Annual Goals and Objectives

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

Goals Summary Information

Table 58 presents Montana's goals for Plan Year 1 of the 5-year Consolidated Plan period (2020-2024). See **Table 56** in SP-45 for Montana's goals for all 5 years of the Consolidated Plan period.

Table 58 – Goals Summary

#	Goal Name	Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	**Preserve and Construct Affordable Housing**	2020 (Apr 1) to 2021 (Mar 31)	Affordable Housing	Statewide	Affordable Housing Preservation and Construction	CDBG: $795,535 HOME: $2,288,900 HTF: $2,010,000	Rental units constructed: 12 Household/Housing Units Rental units rehabilitated: 26 Household/Housing Units Homeowner Housing Added: 2 Household/Housing Units Homeowner Housing Rehabilitated: 3 Household/Housing Units Direct Financial Assistance to Homebuyers: 50 Households Assisted
		Funding and outcome goals are Year 1 estimates. Montana will use CDBG, HOME, and HTF resources to fund affordable housing activities that benefit extremely low-, low-, and moderate-income persons, as well as persons impacted by COVID-19.					
2	**Plan for Communities**	2020 (Apr 1) to 2021 (Mar 31)	Non-Housing Community Development	Statewide	Community Planning	CDBG: $500,000	Other: 15 Local Governments Assisted
		Funding and outcome goals are Year 1 estimates. Montana will use CDBG resources to help communities engage in various types of planning including comprehensive community development, housing, public infrastructure, storm water management, bank stabilization, flood prevention, economic development, downtown revitalization, and preliminary project design. A variety of activities will be funded that primarily benefit low- and moderate-income persons, persons impacted by slums and blight, as well as persons impacted by COVID-19.					
3	**Improve and Sustain Public Infrastructure**	2020 (Apr 1) to 2021 (Mar 31)	Non-Housing Community Development	Statewide	Improving and Sustaining Vital Public Infrastructure	CDBG: $2,636,295	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1,000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
		Funding and outcome goals are Year 1 estimates. Montana will use CDBG resources to improve existing and construct new public water, wastewater, and storm drain infrastructure that primarily benefit low- and moderate-income persons, as well as persons impacted by COVID-19.					
4	**Revitalize Local Economies**	2020 (Apr 1) to 2021 (Mar 31)	Non-Housing Community Development	Statewide	Economic Revitalization	CDBG: $2,000,000	Jobs created/retained: 80 Jobs Businesses assisted: 3 Businesses Assisted
		Funding and outcome goals are Year 1 estimates. Montana will use CDBG resources to create jobs, expand businesses, and revitalize historic downtown business districts. A variety of activities will be funded that primarily benefit low- and moderate-income persons and persons impacted by COVID-19.					

#	Goal Name	Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	**Reduce Homelessness**	2020 (Apr 1) to 2021 (Mar 31)	Homeless	Statewide	Reducing Homelessness	CDBG: $450,000 HOME: $533,032 ESG: $677,159 HTF: $690,000	Tenant-based rental assistance/Rapid Rehousing: 200 Households Assisted Homeless Person Overnight Shelter: 80 Persons Assisted Homelessness Prevention: 480 Persons Assisted Housing for Homeless added: 20 Household/ Housing Units
		Funding and outcome goals are Year 1 estimates. Montana will use CDBG, HOME, HTF, and ESG resources to provide permanent housing, shelter, and services for homeless persons and persons at risk of homelessness. Activities may include operation and maintenance of shelters to be responsive to COVID-19 health and welfare concerns, construction or rehabilitation of housing or shelters, and direct assistance to serve this clientele throughout the state.					

Goal Descriptions

HOME will specifically provide funds to assist extremely low-income, very low-income, and low-income families (as listed in **Table 58**). HOME funds will be used in the following strategic goals: to assist with providing 16 households access to new or rehabilitated rental units, providing 30 households opportunities for homeownership, and assisting 20 households who are homeless or at-risk of homelessness with permanent housing.

HTF will specifically provide funds to assist extremely low-income households (as listed in **Table 58**). HTF funds will assist with providing 22 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 propose to preserve affordable housing, engage in community planning, improve and sustain vital public infrastructure, revitalize local economies, and reduce homelessness. The State of Montana will continue to use ESG funds to reduce homelessness across the state.

Because the State of Montana's HOPWA funds are provided via competitive award and not through a formula grant, a discussion of HOPWA funding priorities is not included herein, and HOPWA allocation priorities are not provided in **Table 59**. For information about the State's HOPWA program, funded via competitive award, please see Montana's HOPWA Annual Progress Report.

Funding Allocation Priorities

Table 59 – Funding Allocation Priorities

Program	Goal										Admin	
	Preserve and Construct Affordable Housing		Plan for Communities		Improve and Sustain Vital Public Infrastructure		Revitalize Local Economies		Reduce Homelessness			
CDBG	$795,535	**12%**	$500,000	**7%**	$2,636,295	**39%**	$2,000,000	**30%**	$450,000	**7%**	$300,467	**4%**
HOME	$2,288,900	**73%**	$0	**0%**	$0	**0%**	$0	**0%**	$533,032	**17%**	$313,547	**10%**
HOPWA	N/A											
ESG	$0	**0%**	$0	**0%**	$0	**0%**	$0	**0%**	$677,159	**93%**	$54,904	**7%**
HTF	$2,010,000	**67%**	$0	**0%**	$0	**0%**	$0	**0%**	$690,000	**23%**	$300,000	**10%**

Reason for Allocation Priorities

The State of Montana identified the allocation priorities set forth above for Plan Year 1 through the 2020-2024 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, nonprofit, and private sector partners, as well as Montana's citizens. 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 9 of 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, MCA, pertaining to the federal Community Services Block Grant (CSBG). 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 Montana's objectives described in this AAP, as well as community development needs resulting from COVID-19. (Note: Montana's allocation of CDBG-CV funds is detailed in its 2019-2020 AAP.)

Support existing Montana communities. Montana will target CDBG, HOME, and HTF funding towards existing communities to increase community revitalization; improve the efficiency of public infrastructure; safeguard rural landscapes and natural resources through comprehensive planning; eliminate or reduce the presence of slums or blight 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, as well as responsiveness to COVID-19 repercussions.

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, as well as responsiveness to COVID-19 repercussions.

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 diversification and resiliency; and expand business access to markets, with a particular focus on employment opportunities located within traditional downtown commercial district comprising a mix of businesses, housing, and services. Institutions may collaborate with local governments to access CDBG funds for workforce training and education courses to increase job creation, retention, and advancement opportunities. Commerce will use CDBG funds for a variety of activities that primarily serve low and moderate income persons throughout the state, as well as those that are impacted by COVID-19.

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, HOME, and HTF funding for preserving and constructing affordable housing that increases mobility and lowers the combined cost of housing, utilities and transportation, building social and economic resiliency to severe events, improving (or require per HOME and HTF regulations) access to broadband at assisted properties, and increasing homeownership and rental opportunities for eligible Montanans, particularly the homeless, disabled, elderly, and other disadvantaged populations, as well as responsiveness to COVID-19 repercussions.

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. Commerce 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 operations and maintenance of shelters to be responsive to COVID-19 health and welfare concerns of individuals who are homeless or at-risk of homelessness, construction or rehabilitation of housing or shelters, and direct assistance to serve homeless or those at risk of homelessness throughout the state. These activities will be included in the grant categories listed previously, as well as those that are impacted by COVID-19 health and welfare concerns.

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

Introduction

Montana's Methods of Distribution are identified for CDBG, HOME, ESG, and HTF for Plan Year 1. For purposes of providing more detailed information, the IDIS eCon Planning Suite System distribution method table (**Table 60 – Distribution Methods by State Program**) has been supplemented and

reformatted to provide the public with a clearer picture of the state's Methods of Distribution for Plan Year 1.

Montana distributes CDBG funds for eligible activities under the following categories: CDBG Affordable Housing Development and Rehabilitation; CDBG Housing Stabilization Program; CDBG Public Facilities; CDBG Economic Development; CDBG Housing, Public Facilities, and Economic Development Planning; and CDBG CARES. Montana distributes HOME and HTF funds for eligible activities under HOME Homebuyer Assistance Program, HOME Housing Development Program, and HTF Program. Montana distributes ESG funds for eligible activities under ESG Program and ESG CARES.

Information about evaluation criteria, allocations, award thresholds, and anticipated outcomes for each of the state's programs is detailed below.

Of note, Commerce publishes application guidelines for programs according to each program's funding cycle. These guidelines adhere to the methods of distribution outlined herein; they also outline additional considerations such as broadband project integration. Under HOME and HTF, for example, projects involving the new construction of four or more units are generally required to install broadband infrastructure. Although not required, CDBG projects with a broadband component may have a competitive advantage. Examples of CDBG projects that could incorporate broadband installation are Public Facilities projects involving the construction of libraries or senior centers and Economic Development projects seeking to provide increased internet access to businesses in rural, underserved areas of the state. Prospective grantees are encouraged to consult application guidelines or contact Commerce staff for further information.

Distribution Methods

Community Development Block Grant (CDGB)

CDBG funds will be used for various activities authorized in Section 105(a) of the amended 1974 Housing and Community Development Act that meet the following CDBG National Objectives: (1) Low and Moderate Income, (2) Slums and Blight, and (3) Urgent Need.

Low and Moderate Income National Objective

The State of Montana annually certifies that not less than 70% of aggregate CDBG 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 target activities that serve persons of LMI. Projects funded with CDBG resources typically provide a community-wide benefit.

Slums and Blight National Objective

To expand the CDBG Program beyond the Low and Moderate Income National Objective, Montana will use CDBG funds (specifically, planning resources) to reduce, eliminate, or prevent slums and blight and address COVID-19 impacts across the state.

Urgent Need National Objective

To further expand the CDBG Program beyond the Low and Moderate Income National Objective, Montana will use CDBG funds to address COVID 19 impacts across the state and alleviate an urgency when the following conditions exist:

- There is a serious and immediate threat to the health or welfare of the community,

- The conditions are of recent origin or recently became urgent and have occurred within the past 18 months,
- The grantee is unable to finance the activity on its own, and
- Other resources of funding are not available to carry out the activity.

CDBG funds are reserved in each of the grant categories detailed below, 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 Commerce may reallocate up to 15% of the total CDBG allocation among all National Objectives (assuring that no less than 70% of CDBG funds will be used for LMI beneficiaries) and grant categories, depending upon needs in the state during any given 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 AAP and will require further steps as identified in Montana's Citizen Participation Plan (**Appendix A**). Reallocations may also be made of any remaining balances within any grant category within the last 3 months of a 15-month obligation deadline to meet the HUD Timely Distribution requirement.

State Program Name: CDBG Affordable Housing Development and Rehabilitation
Funding Sources: CDBG

Describe the State Program addressed by the Method of Distribution: Within the Priority Needs 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 households at or below 80% AMI, with preference for those activities that address impacts related to COVID-19.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: CDBG Affordable Housing Development and Rehabilitation funds are only available for non-entitlement units of general local government via a competitive process that involves completing Commerce's Uniform Application for housing-related loan, grant, and tax credit programs. CDBG Affordable Housing Development and Rehabilitation applications that are proposing to address impacts related to COVID-19 may get preference and/or have greater flexibility in submission of technical documents as part of an application. Commerce will provide further guidance in its application guidelines. The CDBG Affordable Housing Development and Rehabilitation ranking criteria and maximum possible points for each criterion are listed in **Table AP-1**.

Table AP-1 – CDBG Affordable Housing Development and Rehabilitation Ranking Criteria

Ranking Criterion	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

Ranking Criterion	Maximum Possible Points
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, project grant administration manual, and other relevant information and resources are available on Commerce's website at http://comdev.mt.gov/programs/cdbg.

Describe how resources will be allocated among funding categories: For Plan Year 1, Montana will allocate $900,000 in CDBG funds to Affordable Housing Development and Rehabilitation activities. The Affordable Housing Development and Rehabilitation 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, with a preference for those activities that address impacts related to COVID-19.

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 activities.

Anticipated Outcome Measure: Ten rental or homeowner units will be constructed or rehabilitated. In addition, approximately 20 LMI persons will be provided overnight shelter.

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 improving accessibility and energy efficiency for single-family households at or below 80% AMI, with preference for those activities that address impacts related to COVID-19. These activities may include acquisition and/or rehabilitation of housing units made available to LMI persons.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: CDBG Housing Stabilization Program funds are only available for non-entitlement units of general local government via a non-competitive process that involves completing 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 5 years to accomplish the goals established in their application and will gain access to the 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, project grant administration manual, and other relevant information and resources are available on Commerce's website at http://comdev.mt.gov/programs/cdbg.

Describe how resources will be allocated among funding categories: For Plan Year 1, Montana will allocate $300,000 in CDBG funds to Housing Stabilization Program activities. Funds that are not awarded within the first 12 months of the program year, as established in this Consolidated Plan and AAP, will be made available to the Public Facilities, Economic Development, and Affordable Housing Development and Rehabilitation categories 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: Three homeowners 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 Vital 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 provide direct benefits to LMI persons, with preference for those activities that address impacts related to COVID-19.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: CDBG Public Facilities funds are only available for non-entitlement units of general local government via a competitive process that involves completing the W2ASACT's Uniform Application. CDBG Public Facilities applications that will reduce homelessness or provide support for a community service facility and are proposing to address impacts related to COVID-19 may get preference and/or have greater flexibility in submission of technical documents as part of an application. Commerce will provide further guidance in its application guidelines. The CDBG Public Facilities ranking criteria and maximum possible points for each criterion are listed in **Table AP-2**.

Table AP-2 – CDBG Public Facilities Ranking Criteria

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

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

Describe how resources will be allocated among funding categories: For Plan Year 1, Montana will allocate $2,636,295 in CDBG funds to 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, with a preference for those activities that address impacts related to COVID-19.

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 activities.

Anticipated Outcome Measure: Approximately 1,000 LMI persons will be served with new or improved public infrastructure systems; approximately 20 LMI households will be served with access to new or improved community facilities that provide support services to LMI households; and homeless facility operations and maintenance may be assisted, with approximately 5 units of permanent or temporary housing for homeless individuals or youth may 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 various acquisition, construction, installation, or rehabilitation activities that support economic development (e.g., facilities improvements, equipment purchases, and employee trainings), with preference for those activities that address impacts related to COVID-19.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: CDBG Economic Development funds are only available for non-entitlement units of general local government and non-government entities such as local businesses via a competitive application process that ranks applicants on their ability to demonstrate that 51% or more of jobs created or retained are held by or will be filled by qualified LMI persons, document an areawide benefit, or show they will exclusively serve a specific, limited clientele. CDBG Economic Development applications that are proposing to address impacts related to COVID-19 may get preference and/or have greater flexibility in submission of technical documents as part of an application. Commerce will provide further guidance in its application guidelines.

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, project grant administration manual, and other relevant information and resources are available on Commerce's website at http://comdev.mt.gov/programs/cdbg.

Describe how resources will be allocated among funding categories: For Plan Year 1, Montana will allocate $2,000,000 in CDBG funds to 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, with a preference for those activities that address impacts related to COVID-19.

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

Anticipated Outcome Measure: 80 jobs will be created or retained, and 3 businesses assisted.

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

Describe the State Program addressed by the Method of Distribution: Within the Priority Need to Plan for Communities, CDBG funds are utilized to engage in comprehensive planning, downtown master planning, business development planning, market study development, preliminary architectural report development, 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 Housing, Public Facilities, and Economic Development Planning applications are only available for non-entitlement units of general local government via a competitive process in which applications are accepted on an ongoing basis and reviewed and ranked according to the extent to which they align with CDBG National Objectives and address Montana's Priority Needs as set forth in this Consolidated Plan. CDBG Housing, Public Facilities, and Economic Development Planning applications that seek to complete activities in a designated Opportunity Zone or that are proposing to address impacts related to COVID-19 may get preference and/or have greater flexibility in submission of technical documents as part of an application.

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, planning grant administration manual, and other relevant information and resources are available on Commerce's website at http://comdev.mt.gov/programs/cdbg.

Describe how resources will be allocated among funding categories: For Plan Year 1, Montana will allocate $500,000 in CDBG funds to Housing, Public Facilities, and Economic Development Planning activities. The Housing, Public Facilities, and Economic Development 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, with a preference for those activities that address impacts related to COVID-19.

Describe threshold factors and grant size limits. Each project funded must meet the CDBG National Objectives of benefitting persons of LMI or reducing, eliminating, or preventing slums and blight. Up to $50,000 in CDBG funds may be awarded per project for project activities.

Anticipated Outcome Measure: Assistance will be provided to 15 local governments.

State Program Name: CDBG CARES
Funding Sources: CDBG

Describe the State Program addressed by the Method of Distribution: Within the Priority Needs to Preserve and Construct Affordable Housing, Improve and Sustain Vital Public Infrastructure, Revitalize Local Economies, and Reduce Homelessness, CDBG CARES funds will be utilized for a wide variety of activities that are eligible under the CDBG CARES program as prescribed by HUD and within the Mega Waiver (**Appendix I**), including activities that primarily serve LMI households and address the needs of businesses impacted by COVID-19. The use of funds may include the following:

- Economic development activities;
- Public service activities;
- Housing rehabilitation or development activities;
- Public infrastructure activities;
- Activities to provide temporary shelter or housing for homeless persons and persons at risk of homelessness; and
- Urgent Need activities.

For more details about the CDBG CARES program, see Montana's 2019-2020 AAP as amended.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: For details about the criteria used to award CDBG CARES funds, see Montana's 2019-2020 AAP as amended.

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, project grant administration manual, and other relevant information and resources are available on Commerce's website at http://comdev.mt.gov/programs/cdbg.

Describe how resources will be allocated among funding categories: Montana will allocate $10,174,175 in CDBG CARES funds to eligible activities, less state administrative costs. This amount may be increased based on future CDBG CARES allocations from HUD that are made available to address impacts related to COVID-19. For more details about the CDBG CARES allocation, see Montana's 2019-2020 AAP as amended.

Describe threshold factors and grant size limits. Each project funded must meet the CDBG CARES requirements established by HUD in its federal register notice. Maximum award amounts per project are detailed in Montana's 2019-2020 AAP as amended.

Anticipated Outcome Measure: Anticipated outcome measures for the CDBG CARES program are outlined in Montana's 2019-2020 AAP as amended.

State Program Name: HOME Homebuyer Assistance Program
Funding Sources: HOME

Describe the State Program addressed by the Method of Distribution: Within the Priority Need to Preserve and Construct Affordable Housing, HOME funds will be awarded to eligible applicants (nonprofit organizations, CHDOs, and local governments) that 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 income-eligible 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 2020-2024 Consolidated Plan and local planning efforts. Assisted homebuyers must complete homebuyer education and counseling, and the purchased home must meet 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 homes 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 the 2020 Program Year, the State of Montana will allocate $600,000 in HOME resources to HOME Homebuyer Assistance Program activities. The HOME Homebuyer Assistance Program 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 Homebuyer Assistance Program activities must meet HOME requirements. HOME funds may be provided in an amount up to 30% of the purchase price limit (as presented in **Table AP-3**) per homeowner for down payment and closing cost assistance as a 0% 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 0% interest, deferred loan to individuals with a disability or individuals who are enrolled members in a state-recognized Native American tribe. The purchase price for the property cannot exceed HUD purchase price limits, which are published annually and listed below. Resale or recapture provisions must be placed on the HOME-assisted home for the applicable period of affordability, assistance is provided as a 0% interest, deferred loan, and projects must follow all applicable HOME regulations and guidelines for homebuyer assistance. The HUD-published purchase price limits for Montana are listed below.

Table AP-3 – 2020 HOME Purchase Price Limits

Metropolitan FMR Area Name	Existing Single-Family Home	Newly Constructed Single-Family Home
Carbon Co – Billings	$228,000	$271,000
Yellowstone Co – Billings	$228,000	$271,000
Golden Valley Co	$157,000	$271,000
Cascade Co – Great Falls	$176,000	$271,000
Missoula Co – Missoula	$285,000	$285,000
Beaverhead Co	$171,000	$271,000
Big Horn Co	$157,000	$271,000
Blaine Co	$157,000	$271,000
Broadwater Co	$218,000	$271,000
Carter Co	$157,000	$271,000
Chouteau Co	$157,000	$271,000
Custer Co	$157,000	$271,000
Daniels Co	$157,000	$271,000

Metropolitan FMR Area Name	Existing Single-Family Home	Newly Constructed Single-Family Home
Dawson Co	$160,000	$271,000
Deer Lodge Co	$157,000	$271,000
Fallon Co	$158,000	$271,000
Fergus Co	$157,000	$271,000
Flathead Co	$264,000	$271,000
Gallatin Co	$315,000	$315,000
Garfield Co	$157,000	$271,000
Glacier Co	$157,000	$271,000
Granite Co	$183,000	$271,000
Hill Co	$157,000	$271,000
Jefferson Co	$265,000	$271,000
Judith Basin Co	$157,000	$271,000
Lake County	$227,000	$271,000
Lewis & Clark Co	$243,000	$271,000
Liberty Co	$157,000	$271,000
Lincoln Co	$180,000	$271,000
McCone Co	$171,000	$271,000
Madison Co	$219,000	$271,000
Meagher Co	$157,000	$271,000
Mineral Co	$172,000	$271,000
Musselshell Co	$185,000	$271,000
Park Co	$223,000	$271,000
Petroleum Co	$157,000	$271,000
Phillips Co	$157,000	$271,000
Pondera Co	$157,000	$271,000
Powder River Co	$157,000	$271,000
Powell Co	$157,000	$271,000
Prairie Co	$157,000	$271,000
Ravalli Co	$266,000	$271,000
Richland Co	$228,000	$271,000
Roosevelt Co	$157,000	$271,000
Rosebud Co	$157,000	$271,000
Sanders Co	$205,000	$271,000
Sheridan Co	$157,000	$271,000
Silver Bow Co	$157,000	$271,000
Stillwater Co	$238,000	$271,000
Sweet Grass Co	$185,000	$271,000
Teton Co	$170,000	$271,000
Toole Co	$157,000	$271,000
Treasure Co	$157,000	$271,000
Valley Co	$157,000	$271,000
Wheatland Co	$157,000	$271,000
Wibaux Co	$157,000	$271,000
Limits effective April 1, 2020		

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

State Program Name: HOME Housing Development 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 (nonprofit 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 HOME Housing Development 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 2020-2024 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: HOME Housing Development applications are ranked according to the applicant's ability to meet the application criteria and align with the goals in the 2020-2024 Consolidated Plan. HOME Program requirements, grant application and guidelines, the project grant administration manual, and other relevant information and resources are available on the Commerce website at https://comdev.mt.gov/Programs/HOME.

Describe how resources will be allocated among funding categories: For Program Year 2020, the State of Montana will allocate $2,221,932 in HOME resources to HOME Housing Development activities. The HOME Housing 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. All funded HOME Housing Development 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 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.

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 2020-2024 Consolidated Plan and HTF Program goals and objectives and ranking criteria. HTF Program requirements, grant application and 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 Program Year 2020, Commerce will allocate $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, 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 Need to Reduce Homelessness, ESG funds will support activities that provide a comprehensive approach to address the needs of persons who are homeless or at risk of homelessness. 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 persons 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 LMI persons within the services areas. Partnerships with other organizations are considered essential to eliminate duplication of services to best meet the needs within each community. 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 CSBG Program. The ESG Program Policy Manual is available on DPHHS's website at http://dphhs.mt.gov/Portals/85/hcsd/documents/ESGPolicyManual.pdf.

Describe how resources will be allocated among funding categories: For Plan Year 1, Montana will allocate $54,904 to ESG administration, $73,207 to HMIS, and $603,952 to ESG program-specific activities for a total of $732,063.

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

Anticipated Outcome Measure: 830 individuals in 350 households will be served with rental assistance and housing relocation and stabilization services; 60 persons will be assisted with overnight shelter. In addition, 480 persons will receive homeless prevention services.

State Program Name: ESG CARES
Funding Sources: ESG

Describe the State Program addressed by the Method of Distribution: Within the Priority Need to Reduce Homelessness, ESG CARES funds will be utilized for a wide variety of activities that are eligible under the ESG CARES program as prescribed by HUD and within the Mega Waiver (**Appendix I**), including activities that provide a comprehensive approach to address the needs of persons who are homeless or at risk of homelessness. 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 persons who are homeless or at risk of homelessness are able to access needed emergency shelter, street outreach, homelessness prevention, and rapid rehousing services statewide.

Montana's ESG Program will continue to distribute its allocations to 9 of 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 CSBG. Subrecipients are encouraged to develop sub-subrecipient relationships to expand services more effectively. Through this decentralized approach, agencies that work directly with the clients served and partner organizations in the area, may establish work plans that meet the demand they see on a daily basis and the need they have identified through a Needs Assessment process.

All project types are eligible for agencies to use since they depend on local needs.

In addition to this process, DPHHS also set forth a prioritization guidance document to be used by subrecipients in developing local work plans. The guidelines in this document are as followed:

1. Focus on equitably protecting all people experiencing unsheltered and sheltered homelessness from COVID-19 infection and illness.
    a. Street Outreach

        i. Increase outreach and create additional hygiene resources (handwashing stations, showers, laundry) for people in unsheltered locations.
        ii. Implement approaches to referring and safely transporting people to appropriate and safe shelter and/or housing options and to access services.
    b. Shelters
        i. Help to keep shelters open that are struggling or need additional resources.
        ii. Target High risk shelters, shelters with shared living spaces to improve processes.
            1. Identify shelters that are likely to close because they are seasonal or due to lack of staff, lack of funding, inability to implement proper procedures, etc., and create alternate plans to extend operations and/or to safely relocate all people currently staying in such facilities.
        iii. Deconcentrate existing shelters by relocating people to non-congregate settings.
    c. Non congregate shelters
        i. Support non-congregate settings to provide isolation/quarantine units, respite beds, alternate care settings, and temporary shelter options for people.
        ii. Consider continued funding of FEMA funded NCS in the event that FEMA funding is phased out.
        iii. Implement housing focused case management.
        iv. Implement protocols to ensure that no one is purposefully exited from a safe sheltering facility into unsafe shelters or unsheltered homelessness.
    d. Create a plan to ensure that sheltered homeless households do not exit to the street or shelter, but rather exit to permanent housing, within efforts to provide equitable access to housing options for everyone.

2. **Rapid Rehousing**: Add a greater focus on effective and equitable use of resources to re-house people experiencing sheltered and unsheltered homelessness.
    a. Increase diversion efforts and rapidly rehouse those who cannot be diverted.
    b. Target frequent uses/ FUSE for long term assistance and intensive Housing case management.
    c. Continue coordination with local CoCs: Local CoCs will place highest priority on rehousing people with highest vulnerability to COVID-19 as defined by the CDC (cdc.gov) waiving current prioritization processes when necessary to house people with the highest COVID-19 vulnerability first. (Coming from CoC)
    d. Work with PHAs and other housing agencies to access vouchers for households in CARES funded RRH who need long-term assistance.
    e. Link those exiting to housing with needed services, including employment services and opportunities as appropriate.

3. **Homeless Prevention (HP)** – Continue reducing new entries into homelessness through diversion and prevention strategies. Transition program from an eviction-based prevention program to a targeted, needs-based prevention program.
    a. Target HP resources
        i. People at greatest risk of losing their housing and entering shelter/unsheltered locations
        ii. People most at risk of COVID-19

b. Increase assistance with landlord engagement activities to help ESG-eligible families that do not meet targeting requirements. Refer to HUD resources.

4. Focus on strengthening systems
    a. Refocus efforts to align with progressive engagement practices - While each of the previous steps is a distinct program activity, they are also continuous in nature. It is important to make sure a client can flow from one step to the next at any point from which they have entered the system. Accurate HMIS data would track this transition and help agencies monitor a client's progress regardless of entry or agency assisting.
    b. Use ESG to assist households for longer a longer period of time.
    c. Integrate all data into HMIS.
    d. Use data to project need for different interventions and inform equity-based decisions.
    e. Ensure strategies and communications efforts have broad geographic reach, including into rural areas of community and in support of Native American communities.
    f. Engage people with lived experience
    g. Assess whether equitable access is being provided to people of color, especially Black, Hispanic, and Native American populations most impacted by COVID-19 and its economic impacts, and examine data to determine whether there are other disparities to be addressed, such as race, age, ethnicity, disability, gender status, family composition, etc. (A CSBG requirement)
    h. Expand housing-focused case management services and housing subsidy resources within shelters to support people to exit to housing.
    i. Continue to expand and strengthen partnerships between housing providers and other systems and organizations to ensure people in housing are linked to health care and employment services and other appropriate services.

Eligible entity work plans included the following:

- Street Outreach $425,057 serving 474 households with 738 individuals
    - Activities include – Essential Services and handwashing stations/portable bathrooms. Outreach to individuals and families to reduce their risk of COVID-19 infection.
- Emergency Shelter/Temporary Shelter $2,101,944 serving 1,472 households with 1,900 individuals
    - Activities include - Essential Services, Shelter Operations, Leasing, Acquisition, Major Rehab. Funding shelters is essential to reduce the spread of and reduce the risk from COVID-19 infection for individuals and families that are literally homeless and the community. In some cases, hotel/motel costs will be necessary for quarantining or when a shelter is not available.
- Homeless Prevention $3,058,161 serving 596 households with 800 individuals
    - Activities include – Rental Assistance, Relocation and Stabilization Services (Financial Assistance and Services), hazard pay, and landlord incentives to individuals and families who are at risk of homelessness to reduce their risk of COVID-19 infection. Homeless Prevention funds will be used to provide housing stability case management and financial assistance costs as needed. Will utilize landlord and volunteer incentives on an as-needed basis.
- Rapid Rehousing $2,544,496 serving 377 households with 600 individuals
    - Activities include – Rental Assistance, Relocation and Stabilization Services (Financial Assistance and Services), hazard pay, and landlord incentives to individuals and families

who are literally homeless to reduce their risk of COVID-19 infection. Rapid-Rehousing funds will be used to provide housing stability case management and financial assistance costs as needed. Will utilize landlord and volunteer incentives on an as-needed basis.

- HMIS $210,395
    - Activities include – Purchasing leases for new users, staff time and training
- Administration $926,683

ESG CARES program details are also included in Montana's 2019-2020 AAP as amended.

Describe all of the criteria that will be used to select applications and the relative importance of these criteria: The specific standards and eligibility guidelines by which subgrantees implement the ESG CARES program are set forth in Montana's ESG Policy Manual. In addition, DPHHS has published an ESG CV Program Manual.

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—urban, rural, frontier, and tribal. ESG CARES funds are distributed to 9 of the 10 regional HRDCs in Montana based on a formula allocation, reflecting areas of poverty and general population, as set forth in Section 53-10-502, MCA, pertaining to the federal CSBG. Each allocation amount 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. Needs assessments and strategic planning are conducted by the HRDCs to ensure the best alignment of resources available with the needs of LMI persons within the services areas. 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 NASCSP and reported to Congress as part of the CSBG Program.

Updates to program policy with regard to ESG CARES were initially established by policy bulletin issued to subrecipients via email that implement program activities. All policy guidance has been compiled into DPHHS' ESG-CV Policy Manual.

Memorandums included:

Flexibilities and conditions provided by the CARES Act

Given the immediate needs faced by our communities, these funds are subject to the following flexibilities and conditions provided by the CARES Act and only applies to the special allocation:

- *Pre-award costs are authorized* - The funds may be used to cover or reimburse allowable costs incurred by a State or locality before the award of funding (including prior to the signing of the CARES Act) to prevent, prepare for, and respond to COVID-19;
- *No cap on Emergency Shelter/Street Outreach* - The funds are not subject to the spending cap on emergency shelter and outreach under 24 CFR 576.100(b)(1);
- Up to 10% of funds may be used for administrative costs, as opposed to 7.5% as provided by 24 CFR 576.108(a) – this is an increase of admin from 7.5% to 10% (the appropriate amount has been allocated to you in the formula table above);

- The funds are exempt from the ESG match requirements, including 24 CFR 576.201;
- The funds are not subject to the consultation and citizen participation requirements that otherwise apply to ESG; however, each recipient must publish how its allocation has and will be used, at a minimum, on the Internet at the appropriate Government web site or through other electronic media – workplans will be published;
- *Increase of income limit from 30% to 50% AMI for Homelessness Prevention* component - The funds may be used to provide homelessness prevention assistance (as authorized under 24 CFR 576.103 or subsequent HUD notices) to any individual or family who does not have income higher than HUD's Very Low-Income Limit for the area and meets the criteria in paragraphs (1)(ii) and (1)(iii) of the "at risk of homelessness" definition in 24 CFR 576.3;
- That recipients may deviate from applicable procurement standards when using these funds to procure goods and services to prevent, prepare for, and respond to coronavirus, notwithstanding 24 CFR 576.407(f) and 2 CFR 200.317-200.326;
- While the State of Montana encourage entities to offer treatment and supportive services when necessary to assist vulnerable homeless populations, individuals and families experiencing homelessness must not be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which these funds are used, notwithstanding 24 CFR 576.401(e).

HUD waivers submitted

DPHHS submitted a request to use all applicable waivers in the three waiver notices issued by HUD. Subrecipients are to use them at their discretion. In order to use a waiver, they must

1. Document that the use of a waiver was needed, and
2. Note why a waiver was needed.
3. Assure the date of assistance falls within the applicable timeframes.

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only) The ESG Program Policy Manual is available on the DPHHS website at http://dphhs.mt.gov/Portals/85/hcsd/documents/ESGPolicyManual.pdf.

Funds are distributed based on a formula allocation, reflecting areas of poverty and general population, as set forth in Section 53-10-502, MCA, pertaining to the federal CSBG. DPHHS and the subrecipient relationship is established through contracts.

Therefore, each 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. Subrecipients must develop work plans based on the need in their area. If the agency cannot fulfil all of the identified highest needs, they establish sub-subrecipient relationships with other organizations in their community including nonprofit organizations, community and faith-based organizations.

Describe how resources will be allocated among funding categories: Montana will allocate $9,266,836 in ESG CARES funds to eligible activities.

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

Anticipated Outcome Measure:

- Street Outreach serving 474 households with 738 individuals through essential services, outreach case management. In addition, sanitation measures will be implemented in the state's largest homeless camp.
- Emergency Shelter serving 1,472 households with 1,900 individuals. Shelters will have expanded resources effectively moving people off the street into an emergency shelter or a temporary shelter and providing them with wrap around services in order until they are stably housed. Non-Congregate shelters will be supported in communities where traditional shelter services are not available or have reached occupancy limits.
- Rapid Rehousing serving 377 households with 600 individuals, effectively exiting applicants from homelessness into stable housing through housing search and placement, relocation and stabilization services, application and deposit assistance, landlord incentives, maintaining rental assistance over a longer period of time to ensure stability, and following with case management to help clients access other needed services.
- Homeless Prevention serving 596 households with 800 individuals, effectively keeping applicants stably housed by providing up to 6 months of arrear assistance and on-going rental assistance. Where necessary, relocation and stabilization services and landlord incentives will also be provided.
- HMIS - Data collection and integration has expanded through HMIS.

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" or "Tri-State 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; this was determined based on population and need. 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.

Commerce and DPHHS notified the CPD Director of the Denver HUD Field Office, Kathleen Burke, that the State of Montana anticipated using waivers for certain regulatory requirements associated with CPD grant programs to prevent the spread of COVID-19 and to facilitate assistance to eligible communities and households economically impacted by COVID-19. Notification was sent 2 days before the State

anticipated using the waivers and requested flexibilities. Commerce and DPHHS's joint notification of anticipation to use waivers is included as **Appendix I**.

AP-35 Projects – (Optional)

Introduction

All activities funded with CDBG, HOME, or HTF funds during Plan Year 1 must meet one of the project objectives presented in **Table 61**. Funds will be awarded through the processes described in AP-30 Methods of Distribution.

Table 61 – Project Information

#	Project Name
1	Preserve and Construct Affordable Housing
2	Plan for Communities
3	Improve and Sustain Vital Public Infrastructure
4	Revitalize Local Economies
5	Reduce Homelessness

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

Commerce accepts applications from eligible entities across the state to address underserved needs and provides technical assistance to eligible entities to support successful application submissions. Funded activities are limited to those that are submitted to Commerce for consideration.

Allocation priorities are set based on information gathered from the Consolidated Plan Needs Assessment and Market Analysis, as well as prior year application submissions and program trends. Because Commerce does not know the types and scopes of applications that will be received during any plan year, it can only estimate funding and anticipate outcomes. Additionally, the CDBG, HOME, and HTF programs are often oversubscribed and, thus, unable to meet all the needs of eligible entities due to limited funding.

AP-38 Project Summary

Project Summary Information

See AP-35 Projects.

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 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 this AAP, 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 nonprofits to apply for HOME, and entitlement communities and nonprofits to apply for HTF funding, dependent on eligible activities and programs. Entitlement communities may apply for HOME funds if their project demonstrates clear segregation between State-assisted units and Entitlement-assisted units. ESG funds are distributed throughout the state.

HTF application guidelines will consider geographic diversity based on data points gathered from federal, state, and regional sources that correspond to this Consolidated Plan, this AAP, and HTF Program goals and objectives to serve the homeless and those at risk of homelessness. However, because it is not possible to predict which entities will apply for HTF funding to address local needs, geographic distribution for the HTF Program is not specified.

Geographic Distribution

Because the State of Montana does not have geographic priorities for any of its federally funded CPD programs, data are not provided in **Table 62**.

Table 62 – Geographic Distribution

Target Area	Percentage of Funds

Rationale for the priorities for allocating investments geographically

Not applicable.

Discussion

Not applicable.

Affordable Housing

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

Introduction

Tables 64 and **65** summarize Montana's 1-year 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 64 – 1-Year Goals for Affordable Housing by Support Requirement

1-Year Goals for the Number of Households to be Supported	
Homeless	1,340
Non-Homeless	40
Special-Needs	25
Total	1,405

Table 65 – 1-Year Goals for Affordable Housing by Support Type

1-Year Goals for the Number of Households Supported Through	
Rental Assistance	600
The Production of New Units	14
Rehab of Existing Units	26
Acquisition of Existing Units	50
Total	690

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 with 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 with CDBG, HOME, and/or HTF resources in coordination with Housing Tax Credits and private financing for rental projects.

Rehabilitation of existing units will be completed with CDBG, HOME, and/or HTF resources.

Acquisition of existing units will be completed primarily with HOME resources through down payment and closing cost assistance.

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

Introduction

The State of Montana Housing Division manages and oversees HCV funds to 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 AAP 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 AAP 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 AAP 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 ESG. 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, leaving a state correctional or mental health facility, or as a result of impacts from COVID-19. Many households experiencing homelessness double up with family, friends, or others and may be able to find temporary assistance from a faith-based community. 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 substance use disorders, 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, and prioritize funding to those individuals that are homeless or at risk of homelessness who are impacted by COVID-19. 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 permanent supportive housing, support for COVID-19 health and welfare response, 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 12 districts to participate annually in the national PIT 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 significant 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 HUD, with the goal of supporting the transition of homeless individuals into stabilized self-sufficiency in affordable housing. It is important to note that the MTCoC has expressed 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 experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

See the Strategic Plan, **Table SP-1**, which shows the length of time since those surveyed during the 2019 PIT count had a home. Of note, the majority of respondents (242 or 24%) indicated that it had been 2 years or more since they had a home. Unfortunately, research indicates that the longer homelessness is experienced, the more difficult and costly it is to stabilize and re-house.

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 MTCoC districts. 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 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. Funded activities include rental assistance, financial assistance of rental application fees, security and utility deposits and payments, case management, housing search and support for toll free telephone referral hotlines for domestic abuse; referral to mainstream resources; assistance to shelters for victims of domestic and sexual violence, youth homes, and food banks. All HRDCs submit work plans, budgets, and reports outlining which of the allowable activities will be undertaken.

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 subrecipient 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.

See **Table SP-2A and SP-2B** in the Strategic Plan for tangible targets for reducing homelessness.

Individuals and families that have been negatively impacted by COVID-19 through job loss and underemployment may be unable to pay rent. These Montanans face instability and an increased risk of homelessness. By identifying these characteristics in association with the "At risk of homelessness" definition § 576.2 (1) (iii) (G), ESG allows Homeless Prevention funds to assist these individuals and families so that subrecipients may help program participants regain stability in their current permanent housing or achieve stability in other permanent housing, ultimately preventing an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in § 576.2.

In Plan Year 1, HTF funds will also support homeless prevention activities by increasing and preserving the supply of rental housing for extremely low-income households, particularly the homeless, disabled, elderly, and other disadvantaged populations.

Discussion

See SP-60 Homelessness Strategy for more information about Montana's strategy for reducing homeless ness and addressing other special needs.

AP-70 HOPWA Goals – 91.320(k)(4)

Because the State of Montana's HOPWA funds are provided via competitive award and not through a formula grant, a discussion of HOPWA goals is not included herein. For information about the State's HOPWA program, funded via competitive award, please see Montana's HOPWA Annual Progress Report.

AP-75 Barriers to affordable housing – 91.320(i)

Introduction

Several barriers to affordable housing development, housing choice, and maintained residency in housing were identified in the Needs Assessment, Market Analysis, 2018 Fair Housing Survey (**Appendix B**), and 2020 Housing and Community Development Survey (**Appendix B**).

Participants in Commerce's housing focus groups (**Appendix C**) outlined several barriers to affordable housing development, including:

- Capacity challenges at all levels (from the State to grantees and partners), especially in the midst of COVID-19);
- Cumbersome grant processes and unpredictable grant timelines (e.g., grant application process and funding cycle);
- Insufficient program funding, which is exacerbated by the high and rising costs of building and infrastructure; and
- Design constraints.

The 2018 Fair Housing Survey had 691 respondents. Takeaways from the survey are as follows.

- Affordability and unit size were the most important factors in housing choice for both renters and owners.

- 36% of respondents indicated they had witnessed housing discrimination. Level of income was the primary grounds for perceived discrimination, followed by race and criminal background. Source of income, familial status, and disability were also listed as principal grounds of perceived discrimination.
- 66% and 10% of respondents who witnessed discriminatory behavior said that perceived discrimination resulted from actions taken by rental owners/managers and PHA employees, respectively.
- More than 24% of respondents indicated they would not know what to do if they experienced or witnessed discrimination, and a staggering 85% of respondents said they were not familiar with or were only somewhat familiar with fair housing laws.

The 2020 Housing and Community Development Survey had 303 respondents; approximately 200 of these indicated that their community or organization faced barriers to decent, affordable housing. Barriers cited are as follows.

- Insufficient decent, affordable, and accessible housing stock—especially for persons with disabilities, seniors, the workforce, and individuals transitioning out of institutional and correctional facilities.
- Housing markets that price out low- to moderate-income families and service workers, especially housing markets in resort communities where short-term rentals are common and luxury homes are prevalent.
- Land availability and cost; development costs.
- Restrictive building codes and zoning regulations.
- Funding and financing for decent, affordable housing.
- Lack of supportive services and case management for special needs populations.
- Lack of public transportation for workers.
- Underutilized tenant-based rental subsidies (vouchers) resulting from limited housing options and uncooperative landlords.
- Inadequate, coordinated planning efforts.
- Developers not incentivized to develop in rural areas.

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 will continue to address barriers to affordable housing and affirmatively further fair housing.

Commerce and DPHHS staff have historically engaged a steering committee to discuss and implement actions related to the AI. Although Montana is no longer required by regulation to complete an AI, future work may continue at the State's option.

AP-85 Other Actions – 91.320(j)

Introduction

The following are actions planned for Plan Year 1 of the 5-year Consolidated Plan period.

Actions planned to address obstacles to meeting underserved needs

All activities which will be funded under the State'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 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, disaster planning, 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 has identified preserving and constructing affordable housing as one of its high priority needs. As set forth in this 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, and supporting other housing activities. These actions will be funded through the HOME, CDBG, and HTF programs, as set forth above.

Actions planned to reduce lead-based paint hazards

The State will continue to diligently undertake rehabilitation and construction activities to ensure that households, particularly those with children, benefitting from federal housing programs are safe from 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 painting activities that disturb LBP in homes and childcare facilities built before 1978 is certified and follows specific work practices to prevent lead contamination. In addition to complying with Title X, UPCS inspections are performed on all homes (renter or owner-occupied) assisted with HTF, HOME, Section 8, and other public funds.

UPCS inspections are also conducted on all homes purchased with HOME assistance prior to the commitment of HOME funds. State staff conducting UPCS inspections complete UPCS training as well as HUD's online Lead-Based Paint Visual Assessment Training.

Units that ESG-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, in coordination with nonprofit organizations and the private sector, work to ensure individuals and families have pathways out of poverty by supporting local and regional efforts to increase household incomes and provide affordable housing options. All of the strategies and priorities identified in this Consolidated Plan and AAP target the improvement of economic conditions for Montanans of low to moderate income, from the rehabilitation and new construction of affordable units, homebuyer assistance, and temporary shelter services to investment in compact, walkable development where efficiencies of public infrastructure, community services, and employment centers encourage healthy, vital, and resilient communities.

Appendix F discusses poverty in Montana over the last two decades and includes the state's poverty rate as well as its geographic distribution.

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. 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 to eligible entities continues to be one of Montana's greatest challenges. There are areas of opportunity for increased collaboration vertically and horizontally, as well as 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 1, the State will actively engage state agencies and 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, through its CDBG, HOME, HTF, and ESG programs, will continue to coordinate with public and private partners to discuss current projects and methods to better 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 participation in the IHIP and the MTCoC.

Discussion

The State of Montana is committed to addressing critical needs, and to this end, during Plan Year 1, will undertake the actions outlined above.

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

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.

Program Specific Requirements

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

Introduction

This section of the AAP outlines specific requirements of Montana's CDBG, HOME, ESG, and HTF programs.

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.320(k)(1)

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	$0
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:	$0

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.

3-year period: 70%
2020, 2021, and 2022 are the years covered in this AAP.

HOME Investment Partnership Program (HOME)
Reference 24 CFR 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:

Commerce will not use HOME funds beyond eligible uses 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's grantees will use recapture provisions for the Montana HOME Program for HOME-assisted homebuyer projects including down payment assistance, closing costs, or other HOME assistance provided directly to the homebuyer. When Commerce grants HOME funds to a community land trust, the resale provision will be used. State recipients and subrecipients 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 0% 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 and homebuyer assistance when homes will be placed in a community land trust. 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 **Table AP-4**). If the home is transferred within the period of affordability, the resale or recapture provisions will be enforced.

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 unit. 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 in **Table AP-4**.

Table AP-4 – HOME Affordability Periods

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

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, Commerce 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.

1. **Resale Provisions**

Resale provisions will be used when HOME assistance is only used as development subsidy and therefore is not subject to recapture. If homebuyer assistance is provided for a home that will be put

into a community land trust, resale provisions will be used. 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:

- 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;
- 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
- 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% 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 owner's 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 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% 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 website.

2. 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 AAP and 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 0 through 9, as applicable to **Table AP-4**. Enforcement of the recapture provision that occurs during the period of affordability years 10 through 15 (see **Table AP-4**) 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 HOME subsidy recapture provision would not be triggered, rather the owner investment is 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 is 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 **Table AP-4**) to include owner investment is 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 91.320(k)(3)

1. Include written standards for providing ESG assistance (may include as attachment)
ESG is administered by DPHHS, Intergovernmental Human Services Bureau (IHSB) as part of a statewide plan for ending homelessness in Montana.

Of Montana's 10 regional HRDCs, 9 receive ESG assistance (87.5% of the grant funds). DPHHS retains 2.5% for administrative costs, and 10% supports the HMIS upgrade requirements.

Overarching Goals and targeting include:

- Addressing the housing needs of families and individuals at risk of homelessness or facing the possibility of homelessness (Homeless Prevention);
- 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

- 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 and Street Outreach 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 MTCoC to leverage resources and provide increased and coordinated services to homeless Montanans across the state. DPHHS aligns its strategy for reducing and ending homelessness with the MTCoC districts. 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 NOFA. Projects originate from local community continuums of care or a state agency. Project approvals are based on 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 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 increased efficiency.

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

Individuals and families that have been negatively impacted by COVID-19 through job loss and underemployment may be unable to pay rent. These Montanans face instability and an increased risk of homelessness. By identifying these characteristics in association with the "At risk of homelessness" definition § 576.2 (1) (iii) (G), ESG allows Homeless Prevention funds to assist these individuals and families so that subrecipients may help program participants regain stability in their current permanent housing or achieve stability in other permanent housing, ultimately preventing an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in § 576.2.

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 Montana's coordinate assessment system, known locally as the Coordinated Entry System (CES), occurred simultaneously with the rollout of a new HMIS; both launched in earnest in September 2018. Earlier versions of CES were largely paper-based; these were 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 MTCoC is structured around 12 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 2018, and while each district is required to comply with the CES Policies and Procedures, 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 onsite 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 9 of 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, MCA, pertaining to the federal CSBG. 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 or formerly homeless 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 through the CAPER to the NASCSP and reported to Congress as part of the CSBG Program. DPHHS provides onsite 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.

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

1. How will the grantee distribute its HTF funds? Select all that apply:

[X] Applications submitted by eligible recipients
[ ] Subgrantees that are State Agencies
[X] 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 nonprofit 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. Nonprofit organizations must have an Internal Revenue Service 501(c)(3) or 501(c)(4) nonprofit designation to be an eligible recipient of HTF funds. Partner organizations may include for-profit entities, other nonprofit organizations, CHDOs, HRDCs, and PHAs.

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 HTF funds awarded must not exceed the HOME maximum per-unit subsidy limits and rent limits each assisted unit must not exceed HUD-established rent limits. Commerce will not use HTF funds to assist first-time homebuyers, for homeownership housing financing, or for refinancing existing debt.

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-30. HTF Program applications, grant application guidelines, the administration manual, and other relevant information and resources are available on Commerce's 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 nonprofit 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. Nonprofit organizations must have an Internal Revenue Service 501(c)(3) or 501(c)(4) nonprofit designation to be an eligible recipient of HTF funds. Partner organizations may include for-profit entities, other nonprofit organizations, CHDOs, HRDCs, and PHAs.

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.

a. Geographic Diversity and Housing Needs
b. Capacity of the Applicant
c. Affordability and Financial Feasibility
d. Appropriate Design and Long-Term Solution
e. Long-term Planning and Management
f. 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, as well as those impacted by COVID-19.

- 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:
    - 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;
    - Site improvements, such as landscaping, paving, sidewalks, curbs and gutters, onsite utilities, etc., related to rehabilitation or new construction of rental housing;
    - Construction of new rental housing units;
    - Rehabilitation of existing substandard rental housing that is suitable for rehabilitation;
    - Conversion of existing non-housing structures into housing units; and/or
    - 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 geography using the metrics listed below. All counties will be scored based on established metrics using ACS data, and projects will receive a low, medium, or high funding priority based on their location.

- Percentage of families in poverty;
- Available and affordable housing units;
- Rental housing cost burden;
- Transportation plus housing cost burden;
- Substandard housing conditions; and
- 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 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 Commerce website.

Applicants must submit this information through the Uniform Application for Montana 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:

a. The need for any request for HTF Operating Assistance funds; and/or
b. 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".

[X] Yes [ ] No [ ] N/A

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".

[X] Yes [ ] No [ ] N/A

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.

[X] Yes [ ] No

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. 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-unity subsidy amounts for the HTF Program. The HOME and HTF subsidy limits are presented in **Table AP-5**. These limits are subject to change based on HUD's annually published bases.

Table AP-5 – HOME and HTF Maximum per Unit Subsidies

Bedrooms	Base[87]	Total Subsidy
0	$63,881 X 240%	$153,314
1	$73,230 X 240%	$175,752
2	$89,049 X 240%	$213,717
3	$115,201 X 240%	$276,482
4+	$126,454 X 240%	$303,489

8. 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 established rehabilitation standards for all housing units rehabilitated with HTF funds (see **Appendix J**).

The recipient and subgrantee will be required to follow all rehabilitation standards as set forth in 24 C.F.R. § 93.301(b) and **Appendix J** of this document, which include but are not limited to:

- 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).
- 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% of the estimated cost of new construction of a comparable unit or units.
- 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% of the estimated cost of new construction of a comparable unit or units.

[87] https://www.govinfo.gov/content/pkg/FR-2020-06-04/pdf/2020-12084.pdf

9. 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

10. 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% 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 limits are attached.

N/A

11. 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 families, particularly the homeless, disabled, elderly, and other disadvantaged populations.

12. 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

Not applicable.