



# Annual Action Plan

## State of Montana

April 1, 2024 through March 31, 2025

### **Montana Department of Commerce**

P.O. Box 200501

Helena, MT 59620-0501

Phone: 406-841-2700 | Fax: 406-841-2701

[commerce.mt.gov](https://commerce.mt.gov)

Montana 711: [montanarelay.mt.gov](https://montanarelay.mt.gov)



## Table of Contents

The Process .....	6
AP-05 Executive Summary – 91.300(c), 91.320(b).....	6
Introduction .....	6
Summarize the objectives and outcomes identified in the Plan .....	6
Evaluation of past performance.....	9
Summary of Citizen Participation Process and consultation process.....	10
Summary of public comments .....	11
Summary of comments or views not accepted and the reasons for not accepting them .....	11
Summary.....	11
PR-05 Lead & Responsible Agencies – 91.300(b).....	12
Table 1 – Responsible Agencies.....	12
Narrative (optional).....	12
Consolidated Plan Public Contact Information.....	13
AP-10 Consultation – 91.110, 91.300(b), 91.315(l).....	13
Introduction .....	13
Table 2 – Agencies, Groups, Organizations Who Participated .....	16
Table 3 – Other Local / Regional / Federal Planning Efforts.....	51
Narrative (optional).....	53
AP-12 Participation – 91.115, 91.300(c) .....	53
Citizen Participation Outreach .....	54
Table 4 – Citizen Participation Outreach .....	54
AP-15 Expected Resources – 91.320(c)(1,2) .....	56
Introduction .....	56

Allocation Estimates .....	56
Table 5 – Expected Resources – Priority Table .....	60
Discussion.....	64
AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e).....	65
Goals Summary Information .....	65
Goal Descriptions.....	69
AP-25 Allocation Priorities – 91.320(d) .....	70
Introduction .....	70
Funding Allocation Priorities .....	71
Table 7 – Funding Allocation Priorities.....	71
Reason for Allocation Priorities .....	71
AP-30 Methods of Distribution – 91.320(d)&(k) .....	74
Introduction .....	75
Distribution Methods .....	76
Discussion.....	94
AP-35 Projects – (Optional) .....	95
Introduction .....	95
Table 9 – Project Information.....	95
AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii).....	96
AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii).....	96
AP-50 Geographic Distribution – 91.320(f) .....	96
Geographic Distribution .....	97
Table 10 – Geographic Distribution .....	97
Rationale for the priorities for allocating investments geographically.....	97
Discussion.....	97

AP-55 Affordable Housing – 24 CFR 91.320(g).....	97
Introduction .....	97
Table 11 – 1-Year Goals for Affordable Housing by Support Requirement .....	98
Table 12 – 1-Year Goals for Affordable Housing by Support Type.....	98
Discussion.....	98
AP-60 Public Housing - 24 CFR 91.320(j) .....	99
Introduction .....	99
Discussion.....	100
AP-65 Homeless and Other Special Needs Activities – 91.320(h).....	100
Introduction .....	100
Discussion.....	105
AP-70 HOPWA Goals – 91.320(k)(4).....	106
AP-75 Barriers to affordable housing – 91.320(i).....	106
Introduction .....	106
Discussion.....	109
AP-85 Other Actions – 91.320(j) .....	110
Introduction .....	110
Discussion.....	114
Anti-Displacement and Relocation Assistance Plan .....	114
AP-90 Program Specific Requirements – 91.320(k)(1,2,3).....	115
Introduction .....	115
Community Development Block Grant Program .....	116
HOME Investment Partnership Program .....	117
Table AP-4 – HOME Affordability Periods.....	119

 **COMMERCE**

Emergency Solutions Grant.....	125
Housing Trust Fund (HTF) .....	129
Table AP-5 – HOME and HTF Maximum per Unit Subsidies.....	135
Discussion.....	138

# The Process

## **AP-05 Executive Summary – 91.300(c), 91.320(b)**

### Introduction

The State of Montana’s 2024-2025 Annual Action Plan serves as the application to the U.S. Department of Housing and Urban Development for funding of the Community Development Block Grant, HOME Investment Partnerships Program, Emergency Solutions Grant and National Housing Trust Fund for Plan Year 5 of the 2020-2024 Montana Consolidated Plan for Housing and Community Development. The 2024-2025 AAP and 2020-2024 Consolidated Plan comprehensively fulfill three basic goals in Montana: provide decent housing, provide suitable living environments, and expand economic opportunities.

The 2024-2025 AAP describes to HUD any changes or trends in Montana’s housing, homeless populations, special needs populations, community development and economic development needs during the period since the submission of the 2020-2024 Consolidated Plan. The 2024-2025 AAP also summarizes the actions Montana will take to support the strategic goals identified in the Consolidated Plan during Plan Year 5, from April 1, 2024, through March 31, 2025.

### Summarize the objectives and outcomes identified in the Plan

The following list presents the objectives and outcomes of the 2020-2024 Consolidated Plan the State of Montana will pursue over Plan Year 5:

1. Support existing Montana communities:
  - Target funding toward communities to increase their capacity to respond to health, safety, economic, and other needs; strengthen community revitalization efforts; improve the efficiency of public works investments; and safeguard rural landscapes and natural resources;

- Encourage appropriate and comprehensive planning, market studies, preliminary architectural reports, flood prevention plans, and other studies or plans that address health, safety, and economic concerns as well as support the sustainability of local communities, affordable housing, public works investments, vital employment centers, and the environment;
  - Enhance the unique and resilient characteristics of all communities by investing in healthy, safe, and walkable neighborhoods-rural, urban, or suburban;
  - Encourage the rehabilitation of existing rental and owner-occupied homes, particularly for those with special needs and the elderly; and
  - 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:
- Provide funding preference for infrastructure projects that address health and safety concerns;
  - 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;
  - Provide funding opportunities to improve the safety and efficiency of public infrastructure, promote healthy, safe, and walkable neighborhoods, and safeguard the environment; and
  - Provide funding opportunities to serve eligible Montanans, particularly special needs and elderly populations, with safe, efficient public infrastructure.
3. Enhance Montana's economic competitiveness:

- Provide reliable and timely access to educational opportunities, services and other basic needs by workers, as well as expanded business access to markets;
  - Support comprehensive planning for downtown revitalization, business development, and other studies or plans to attract and retain talent in Montana communities;
  - Provide job opportunities to eligible Montanans to strengthen communities within the state;
  - 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;
  - Encourage mixed-use development that contributes to broader revitalization efforts in Montana communities; and
  - 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:
- 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;
  - 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;
  - 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;
  - 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

- 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:**

- Encourage activities that address the housing needs of Montanans who are homeless and/or those at risk of homelessness;
- 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
- Encourage the development and rehabilitation of non-rental facilities for the shelter of temporarily homeless Montanans.

## Evaluation of past performance

The Montana Departments of Commerce and Public Health and Human Services have received annual funding for the CDBG, HOME, ESG and HTF programs. While regulatory requirements have expanded including but not limited to the Build America, Buy America Act, HOTMA, NSPIRE, radon mitigation, environmental justice, program funding has not kept pace with the increased cost of construction or administration, making 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 serving households at or below 80% of area median income. As demonstrated in past performance reports, these programs have been a critical funding source for planning for unprecedented growth, constructing senior and health facilities in rural areas, developing homeless facilities and affordable housing that provides services and support throughout the state, and providing clean water and sanitary sewer to support the growth of vital, resilient communities across Montana.

Commerce evaluates its past performance in Consolidated Annual Performance and Evaluation Reports for each program year. Each CAPER documents the objectives and outcomes identified in each AAP and includes an evaluation of past performance, which

compares measurable goals and objectives with actual performance. These documents can be found on Commerce's website at [commerce.mt.gov/Consolidated-Plan/Documents](https://commerce.mt.gov/Consolidated-Plan/Documents).

## Summary of Citizen Participation Process and consultation process

The AAP 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 followed the standards set forth in its Citizen Participation Plan (Appendix A of the 2020-2024 Consolidated Plan) during development and proposal of its 2024-2025 AAP documents.

Commerce and DPHHS provided multiple opportunities for the public and stakeholders to comment on the creation and development of the 2024-2025 AAP. The first public hearing was held on April 3, 2024, to assess needs, develop a strategy for addressing needs, and solicit general input. The second public hearing was held on May 29, 2024, to present the public with the State's proposed plan, receive comments on the Draft AAP document, and gather public comments. Both the initial input period and the document review period for the Draft 2024-2025 AAP were proactively advertised. Commerce announced the public meetings and comment periods by emailing notices to approximately 5,000 contacts and publishing print advertisements in newspapers across Montana. Approximately 20 individuals participated in the public meeting on April 3, 2024, via webinar or phone; approximately XX individuals participated in the public meeting on May 29, 2024, via webinar or phone.

Recordings of and/or transcripts for the public meetings will be available on Commerce's website at [commerce.mt.gov/Consolidated-Plan](https://commerce.mt.gov/Consolidated-Plan). Documentation of meetings (advertisements, presentations, official transcripts, etc.) will be provided as Appendix B.

## Summary of public comments

Verbal comments regarding the development of the 2024-2025 AAP were received during public meetings on April 3, 2024, and May 29, 2024. Written comments regarding the development of the 2024-2025 AAP were accepted during the initial input period from March 19, 2024, to April 17, 2024, and during the document review period from May 15, 2024, to June 13, 2024. All comments received were considered and incorporated into the 2024-2025 AAP documents.

A summary of all public comments received during the public comment periods for the 2024-2025 AAP are provided as Appendix B.

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

All public comments or views received during the public comment periods for the 2024-2025 AAP were considered. A summary of public comments or views received that were not accepted, if any, and the reasons for not accepting them, are provided as Appendix B.

## Summary

The 2024-2025 AAP functions as:

- A comprehensive 1-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.

## PR-05 Lead & Responsible Agencies – 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 2024-2025 AAP and those responsible for administration of each grant program and funding source.

*Table 1 – Responsible Agencies*

Agency Role	Name	Department / Agency
Lead Agency	Paul Green, Director	Montana Department of Commerce
CDBG Administrator	Galen Steffens, Division Administrator	
HOME Administrator	Cheryl Cohen, Division Administrator	
HTF Administrator		
ESG Administrator	Jessie Counts, Division Administrator	Montana Department of Public Health and Human Services
HOPWA Administrator		

### Narrative (optional)

Commerce is the lead agency overseeing the development of the 2024-2025 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**

Cheryl Cohen, Division Administrator

Montana Housing

Montana Department of Commerce

Phone: 406-841-2840

Email: [docconplan@mt.gov](mailto:docconplan@mt.gov)

Web: [commerce.mt.gov/Consolidated-Plan](https://commerce.mt.gov/Consolidated-Plan)

Galen Steffens, Division Administrator

Community MT

Montana Department of Commerce

Phone: 406-841-2770

Email: [docconplan@mt.gov](mailto:docconplan@mt.gov)

Web: [commerce.mt.gov/Consolidated-Plan](https://commerce.mt.gov/Consolidated-Plan)

## **AP-10 Consultation – 91.110, 91.300(b), 91.315(I)**

### **Introduction**

The State of Montana engaged in extensive consultation in the preparation of the 2020-2024 Consolidated Plan. The process provided a unifying opportunity for units of local government, the State of Montana, the public, interested organizations, and the private sector to take part in shaping Montana's unique communities, vital public infrastructure, economic competitiveness, housing opportunities, and homelessness programs.

In addition to engaging the public as outlined in the Citizen Participation Plan (Appendix A of the 2020-2024 Consolidated Plan), Commerce and DPHHS continually engage with other state and federal agencies, tribal and local governments, nonprofit organizations, and the private sector to prioritize annual program needs and goals.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and 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 2024-2025 AAP, as well as the planning process. Regular updates and information about the programs and the development, preparation, and review of the 2024-2025 AAP are sent to this list, especially when soliciting public comment or providing notice of public meetings.

Commerce is collaborating with DPHHS on the recently approved Healing and Ending Addiction Through Recovery and Treatment waiver, offering Medicaid funded Tenancy Support Services. The HEART workgroup is currently creating policy language and proceeding through the Administrative Rule Making process to implement this new program, in partnership with current providers of tenancy support services.

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 is a diverse statewide collaboration of homeless service providers including nonprofits, faith-based organizations, and local

governments and state agencies 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 Consolidated Plan.

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 the state's 10 Human Resource Development Councils, 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.

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. Subrecipients of ESG must use the Homeless Management Information System and work with their local Coordinated Entry System to operate the program. DPHHS is no longer the leading agent for Homeless Management Information System; however, continues to be involved in HMIS development, training, and regular data cleaning.


**COMMERCE**

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	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 hearing
2	Montana Department of Public Health and Human Services	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	Attended planning meetings to develop plan sections; included on email listserv; participated


**COMMERCE**

			Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	as public repository; attended public hearing
3	Ability Montana	regional organization		Participated as public repository
4	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
5	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-	Participated as public repository


**COMMERCE**

			Based Paint Strategy; Anti-Poverty Strategy; Other – Infrastructure	
6	Anaconda Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
7	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
8	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


**COMMERCE**

9	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
10	Billings Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
11	Blackfeet Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
12	Butte Public Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv


**COMMERCE**

13	Butte-Silver Bow Consolidated City-County	county	Housing Needs Assessment; Public Housing Needs; Homeless Needs – Chronically Homeless; Homeless Needs-Families with Children; Homelessness Needs-Veterans; Homelessness Needs-Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other-Infrastructure	Included on email listserv;
14	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
15	Chippewa-Cree Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv


**COMMERCE**

16	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
17	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
18	City of Helena	local	Housing Needs Assessment; Public Housing Needs; Homeless Needs-Chronically Homeless; Homeless Needs-Families with Children; Homelessness	Included on email listserv


**COMMERCE**

			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	
19	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
20	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;	Included on email listserv


**COMMERCE**

			Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other-Infrastructure	
21	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
22	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


**COMMERCE**

23	Community Action Partnership of Northwest Montana 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
24	CTA Architects & Engineers	business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other-Infrastructure	Included on email listserv
25	Dawson County Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
26	District IV Human Resource Development Council 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;	Included on email listserv; participated as public repository


**COMMERCE**

			Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy	
27	District VI Human Resource Development Council 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
28	District VII Human Resource Development Council 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
29	District IX Human Resource Development	regional organization; services-elderly		Participated as a public repository


**COMMERCE**

	Council in Bozeman	persons; services-children		
30	District XI Human Resource Development Council 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; attended public hearing
31	District XII Human Resource Development Council 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
32	Eastern Plains Economic	regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs-Chronically Homeless; Homeless Needs-Families with Children; Homelessness	Included on email listserv


**COMMERCE**

	Development Corporation		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	
33	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
34	Fort Belknap Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
35	Fort Peck Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
36	GL Development	business leaders	Housing Needs Assessment; Public Housing Needs; Homeless Needs-Families with Children; Homelessness Needs-Veterans; Homelessness Needs-Unaccompanied Youth; Homelessness	Included on email listserv


**COMMERCE**

			Strategy; Non-Homeless Special Needs; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other-Infrastructure	
37	Glasgow Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
38	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
39	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


**COMMERCE**

40	Great West Engineering	business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other-Infrastructure	Included on email listserv
41	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
42	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
43	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


**COMMERCE**

44	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
45	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 hearing
46	Hot Springs Community Association	civic leaders	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; Anti-Poverty Strategy; Market Analysis; Economic Development; Other-Infrastructure	Included on email listserv
47	Housing Solutions, LLC	business leaders	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; HOPWA	Included on email listserv


**COMMERCE**

			Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy	
48	Human Resource Development Council 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
49	KLJ Engineering	business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other-Infrastructure	Included on email listserv
50	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-	Included on email listserv


**COMMERCE**

			Based Paint Strategy; Anti-Poverty Strategy; Other-Infrastructure	
51	Land Solutions, LLC	business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other-Infrastructure	Included on email listserv
52	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
53	Living Independently for Today and Tomorrow	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;	Included on email listserv; participated as public repository


**COMMERCE**

			Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy	
54	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
55	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


**COMMERCE**

56	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
57	Midwest Assistance Program	regional organization	Market Analysis; Economic Development; Anti-Poverty Strategy; Other-Infrastructure	Included on email listserv
58	Miles City Public Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
59	Missoula County	county	Housing Needs Assessment; Public Housing Needs; Homeless Needs-Chronically Homeless; Homeless Needs-Families with Children; Homelessness	Included on email listserv, attended public hearing


**COMMERCE**

			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	
60	Missoula Public Housing Authority (PHA)	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
61	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
62	Montana Board of Housing	state	Housing Needs Assessment; Public Housing Needs; Homeless Needs-Chronically Homeless; Homeless Needs-Families with Children; Homelessness	Included on email listserv


**COMMERCE**

			Needs-Veterans; Homelessness Needs- Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy	
63	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
64	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
65	Montana Continuum of Care Coalition	regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs-Chronically Homeless; Homeless Needs-Families with Children; Homelessness	Included on email listserv


**COMMERCE**

			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	
66	Montana Department of Environmental Quality	state	Lead-Based Paint Strategy; Other-Infrastructure	Included on email listserv
67	Montana Department of Labor & Industry	state	Market Analysis; Economic Development; Anti-Poverty Strategy	Included on email listserv
68	Montana Department of Natural Resources and Conservation	state	Economic Development; Other-Infrastructure	Included on email listserv
69	Montana Department of Revenue	state	Housing Needs Assessment; Economic Development; Market Analysis	Included on email listserv


**COMMERCE**

70	Montana Department of Transportation	state	Non-Homeless Special Needs; Economic Development; Other-Infrastructure	Included on email listserv
71	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
72	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
73	Montana Independent Living Project	regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs-Chronically Homeless; Homeless Needs-Families with Children; Homelessness Needs-Veterans; Homelessness Needs-	Included on email listserv; participated as public repository


**COMMERCE**

		services- persons with disabilities	Unaccompanied Youth; Homelessness Strategy; Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead- Based Paint Strategy; Anti-Poverty Strategy	
74	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
75	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
76	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	Participated as public repository


**COMMERCE**

			Needs; HOPWA Strategy; Lead-Based Paint Strategy; Anti-Poverty Strategy	
77	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
78	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
79	Murtagh Municipal Engineering	business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other-Infrastructure	Included on email listserv
80	NeighborWorks Great Falls	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;	Included on email listserv; attended public hearing


**COMMERCE**

			Market Analysis; Lead-Based Paint Strategy; Anti-Poverty Strategy	
81	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
82	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 hearing
83	North Fork Development, LLC	business leaders	Housing Needs Assessment; Homeless Needs-Chronically Homeless; Homeless Needs-Families	Attended public hearing


**COMMERCE**

			with Children; Homelessness Needs-Veterans; Homelessness Needs-Unaccompanied Youth; Non-Homeless Special Needs	
84	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
85	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
86	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


**COMMERCE**

87	Poplar Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
88	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
89	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
90	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;	Included on email listserv


**COMMERCE**

			Non-Homeless Special Needs; HOPWA Strategy; Market Analysis; Economic Development; Lead-Based Paint Strategy; Anti-Poverty Strategy; Other-Infrastructure	
91	Richland Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
92	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
93	Ronan Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv
94	Rural Community Assistance Corporation	regional organization	Market Analysis; Economic Development; Anti-Poverty Strategy; Other-Infrastructure	Included on email listserv


**COMMERCE**

95	Rural Economic Designs	business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other-Infrastructure	Included on email listserv
96	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
97	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
98	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


**COMMERCE**

99	Stahly Engineering & Associates	business leaders	Housing Needs Assessment; Non-Homeless Special Needs; Market Analysis; Economic Development; Other-Infrastructure	Included on email listserv
100	State Bank of Townsend	business leaders	Housing Needs Assessment; Market Analysis; Economic Development	Included on email listserv
101	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
102	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
103	Sweetgrass Development	regional organization	Housing Needs Assessment; Public Housing Needs; Homeless Needs-Chronically Homeless; Homeless Needs-Families with Children; Homelessness	Included on email listserv


**COMMERCE**

			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	
104	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
105	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


**COMMERCE**

106	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
107	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
108	U.S. Department of Agriculture-Rural	federal	Housing Needs Assessment; Homelessness Strategy; Non-Homeless Special Needs; Market	Included on email listserv


**COMMERCE**

	Development (USDA-RD), Montana Field Office		Analysis; Economic Development; Anti-Poverty Strategy; Other-Infrastructure	
109	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
110	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
111	Whitefish Housing Authority	PHA	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; HOPWA Strategy; Lead-Based Paint Strategy	Included on email listserv



## COMMERCE

112	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
-----	-----------------------	------------------	---	----------------------------

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 2024-2025 AAP. There were many additional agencies, groups, and organizations that participated in the development of the 2020-2024 Consolidated Plan. For a complete list of agencies, groups, and organizations that Commerce contacted regarding the development of the draft plan, see Appendix E of the 2020-2024 Consolidated Plan.

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

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

*Table 3 – Other Local / Regional / Federal Planning Efforts*

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your strategic plan overlap with the goals of each plan?</b>
Joint Policy Statement	Montana Continuum of Care	The MTCoC provides funding for many of the same activities provided through the HUD-funded programs addressed in the 2020-2024 Consolidated Plan and 2023-2024 AAP for homeless individuals and families. MTCoC conducted strategic planning in October 2021, including participation from Commerce and DPHHS.
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.
2024-2028 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,


**COMMERCE**

		<p>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.</p>
<p>2020-2024 Consolidated Plan</p>	<p>City of Great Falls</p>	<p>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.</p>
<p>2024-2028 Consolidated Plan</p>	<p>City of Bozeman</p>	<p>The State and the City of Bozeman share the same primary goals of supporting infrastructure, economic development, public facilities, community facilities, housing, and public services.</p>

## Narrative (optional)

Not applicable.

### **AP-12 Participation – 91.115, 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.

Commerce developed a list of over 2,000 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 of the 2020-2024 Consolidated Plan).

The stakeholders were notified of all aspects of the development of the 2024-2025 AAP documents, including invitations to attend public meetings and notice of availability of draft documents for review and comment. All meetings were conducted via webinar; 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.

The public comment period for the Draft 2024-2025 AAP was advertised on May 14, 2024, began on May 15, 2024, and will end on June 13, 2024. Commerce and DPHHS held the first of two public hearings on April 3, 2024., to solicit general input, and the second on May 29, 2024., seeking feedback on the published Draft 2024-2025 AAP. Approximately 20 attendees attended the first general inquiry public hearing. Public comments and views submitted during the first public hearing and comment period were used in determining the goals and priorities of the AAP.

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 the 2024-2025 AAP to enhance public participation, increase access to information, and publish plan documents (Appendix B). Commerce utilized email and newspaper advertisements to notify the public of all plan activities (Appendix B). 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	<p><b>Summary of response/attendance:</b> Commerce announced the development and availability of the Draft 2024-2025 AAP by emailing notice to the Consolidated Plan contact list.</p> <p><b>Summary of comments received:</b> See <b>Appendix B</b> for a summary of comments received and responses provided.</p> <p><b>Summary of comments not accepted and reasons:</b> See <b>Appendix B</b> for a summary of comments not accepted and reasons.</p>	N/A
2	Public Hearing	Non-targeted/ broad community	<p><b>Summary of response/attendance:</b> Commerce and DPHHS held two public hearings on April 3, 2024 and May 29, 2024 at 2 p.m. MST, seeking feedback on the published Draft 2024-2025 AAP.</p>	N/A

			<p><b>Summary of comments received:</b> See <b>Appendix B</b> for a summary of comments received and responses provided.</p> <p><b>Summary of comments not accepted and reasons:</b> See <b>Appendix B</b> for a summary of comments not accepted and reasons.</p>	
3	Newspaper Ad	Non-targeted/ broad community	<p><b>Summary of response/attendance:</b> Commerce announced the development and availability of the Draft 2024-2025 AAP by publishing advertisements in newspapers across Montana.</p> <p><b>Summary of comments received:</b> See <b>Appendix B</b> for a summary of comments received and responses provided.</p> <p><b>Summary of comments not accepted and reasons:</b> See <b>Appendix B</b> for a summary of comments not accepted and reasons.</p>	N/A
4	Internet Outreach	Non-targeted/ broad community	<p><b>Summary of response/attendance:</b> Commerce announced the development and availability of the Draft 2024-2025 AAP on its website, as well as posted all plan documents for public review.</p> <p><b>Summary of comments received:</b> See <b>Appendix B</b> for a summary of</p>	<a href="https://commerce.mt.gov/Consolidated-Plan">commerce.mt.gov/Consolidated-Plan</a>

			<p>comments received and responses provided.</p> <p><b>Summary of comments not accepted and reasons:</b> See <b>Appendix B</b> for a summary of comments not accepted and reasons.</p>	
5	Other – Public Repositories	Non-targeted/broad community	<p><b>Summary of response/attendance:</b> Commerce provided the public with access to hardcopies of the Draft 2024-2025 AAP at over 20 publicly accessible locations across Montana.</p> <p><b>Summary of comments received:</b> See <b>Appendix B</b> for a summary of comments received and responses provided.</p> <p><b>Summary of comments not accepted and reasons:</b> See <b>Appendix B</b> for a summary of comments not accepted and reasons.</p>	<p><a href="https://commerce.mt.gov/Consolidated-Plan">commerce.mt.gov/Consolidated-Plan</a></p>

## 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 5 (April 1, 2024, to March 31, 2025).

### Allocation Estimates

This section describes the HUD resources expected to be allocated by program throughout the state of Montana during Plan Year 5 (April 1, 2024, to March 31, 2025).

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. For Year 5, Montana will cap its general planning and administration allocations at 20% of its allocation and will not use any portion of program income for general planning and administration costs. The use of administrative funds for the state will not exceed 3% plus \$100,000, which is included in the cap. The balance of general planning and administrative funds will be available 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. 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 10% of the HOME allocation for Year 5. 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 10% of the HTF allocation for Year 5. 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 25% of the total CDBG allocation among grant categories, depending on the needs in the state during the plan year. A reallocation of more than 25% 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 of the 2020-2024 Consolidated Plan). CDBG funds may be reallocated in the case of a disaster and funds must be used immediately. In the event of a disaster, Commerce will follow the citizen participation plan as described in the Consolidated Plan. 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 25% 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 25% 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 of the 2020-2024 Consolidated Plan). 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% 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 25% may be authorized by the Director of Commerce. 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 requirements.

For ESG, DPHHS allocates funds to ensure the provision of ESG services statewide so all Montanans who are homeless or near homeless have access in or near their communities. 7.5% of ESG funds are allocated to administrative activities; DPHHS retains 2.5% of this 7.5% and 5% of this 7.5% is distributed to the HRDCs for administrative costs. An additional 5% is retained for Homeless Management Information System (HMIS). ESG funds are distributed based on a formula allocation for Montana's 12 poverty districts, reflecting poverty and population in the area as relative to poverty and population in the entire state. This process is set forth in Montana Code Annotated Section 53-10-502, which pertains to the federal Community Services Block Grant. Currently, ESG funds are allocated to 8 of the 10 HRDCs in Montana represent 8 of the 12 poverty districts. DPHHS is currently engaged in a limited solicitation bid for districts 1-4.

Table 5 describes the HUD resources to be used across the state to achieve the objectives of each program.


**COMMERCE**

Table 5 – Expected Resources – Priority Table

Program	Source of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of Con Plan	Narrative Description
		Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	Public/ Federal	\$6,172,506	\$0	\$0	\$6,172,506	\$6,172,506	State allocation; CDBG funds matched in some grant categories by units of general local government; State funds used to meet CDBG match requirements
	<b>Uses of Funds:</b> Acquisition, Administration and Planning, Economic Development, Housing, Public Improvements, Public Services, and Homeowner Rehabilitation. National Objectives include Low and Moderate Income and Slums and Blight.						
HOME	Public/ Federal	\$3,000,000	\$500,000	\$0	\$3,500,000	\$3,500,000	State allocation; HOME funds matched by recipients


**COMMERCE**

	<b>Uses of Funds:</b> Acquisition, Administration, Homebuyer Assistance, Multifamily New Construction, Multifamily Rehabilitation, and New Construction for Ownership.						
HOPWA	Public/ Federal	\$0	\$0	\$0	\$0	\$0	Montana only receives HOPWA competitive funds
	<b>Uses of Funds:</b> N/A						
ESG	Public/ Federal	\$744,418	\$0	\$0	\$744,418	\$744,418	State allocation; ESG funds matched by subrecipients
	<b>Uses of Funds:</b> Financial Assistance, Homeless Prevention, Emergency Shelter, Rapid Re-housing , Rental Assistance Services, and Street Outreach.						
HTF	Public/ Federal	\$3,144,833.37	\$0	\$0	\$3,144,833.37	\$3,144,833.37	State allocation
	<b>Uses of Funds:</b> Acquisition, Administration, Multifamily New Construction, and Multifamily Rehabilitation.						

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 5 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.

The CDBG Program requires 50% match for Economic Development 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, private bank loans, or owner equity.

The CDBG Program requires 25% match for Public and Community 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 CDBG Program requires a 25% match for Planning projects. Funds requested for economic development activities on behalf of a private entity for site-specific projects require a 100% match. At least one-third of the required match funds must be from local sources, not state or federal funds.

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.

The HOME Program requires 5% match funding for projects . Local match sources include, but are not limited to, 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.

ESG funds are matched by subrecipients who provide rental assistance, transitional housing and/or supportive services through collaboration with the MTCOC. 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 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 the 2024-2025 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.

On June 14, 2023, Governor Gianforte signed House Bill 819, titled “Create Montana community reinvestment act to fund workforce housing”. A component of this legislation directs the Department of Natural Resources to assess use of state trust lands for attainable housing. Below is the applicable excerpt from the bill:

Where state trust lands are in close proximity to cities, towns, or communities:

1. The department of natural resources and conservation shall undertake an evaluation of whether the lands could be made available for use as land for potential development of attainable workforce housing as a part of the Montana community reinvestment plan; and
2. Each community reinvestment organization shall consider the use of state lands to support critical public employee services, including attainable workforce housing as part of the Montana community reinvestment plan.

This recommendation was included in the Governor’s Housing Task Force report.

## Discussion

Not applicable.

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

### Goals Summary Information

Table 6 presents Montana’s goals for Plan Year 5 of the 5-year Consolidated Plan period (2020-2024).

#	Goal Name	Year	Category	Geographic Area	Needs Addressed	Estimated Funding	Goal Outcome Indicator
1	Preserve and construct affordable housing	2024 (Apr 1) to 2025 (Mar 31)	Affordable Housing	Statewide	Affordable Housing Preservation and Construction	CDBG: \$1,150,000  HOME: \$2,700,000 HOME PI: \$500,000  HTF: \$2,080,350	Rental units constructed: 20 Household/Housing Units  Rental units rehabilitated: 30 Household/Housing Units  Homeowner Housing Added: 2 Household/Housing Units


**COMMERCE**

							Homeowner Housing Rehabilitated: 5 Household/Housing Units  Direct Financial Assistance to Homebuyers: 10 Households Assisted
		Funding and outcome goals are Year 5 estimates. Montana will use CDBG, HOME, and HTF resources to fund affordable housing activities that benefit extremely low-, low-, and moderate-income persons.					
2	Plan for communities	2024 (Apr 1) to 2025 (Mar 31)	Non-Housing Community Development	Statewide	Community Planning	CDBG: \$600,000	20 Local Governments Assisted
		Funding and outcome goals are Year 5 estimates. Montana will use CDBG resources to help communities engage in various types of planning including comprehensive community development and master plans, housing needs assessments, land use maps, public infrastructure, storm water management, bank stabilization, flood prevention, economic development, downtown revitalization,					


**COMMERCE**

		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.					
3	Improve and sustain public infrastructure	2024 (Apr 1) to 2025 (Mar 31)	Non-Housing Community Development	Statewide	Improving and Sustaining Vital Public Infrastructure	CDBG: \$2,587,331	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 5 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.					
4	Revitalize local economies	2024 (Apr 1) to 2025	Non-Housing Community Development	Statewide	Economic Revitalization	CDBG: \$1,050,000	Jobs created/retained: 30 Jobs  Businesses assisted: 2


**COMMERCE**

		(Mar 31)					
		Funding and outcome goals are Year 5 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.					
5	Reduce homelessness	2024 (Apr 1) to 2025 (Mar 31)	Homeless	Statewide	Reducing Homelessness	CDBG: \$500,000 ESG: \$744,418 HTF: \$750,000.37	Rapid Rehousing: 100 Households Assisted Homeless Person Overnight Shelter: Persons Assisted: 60 Housing for Homeless added: 10 Household/Housing Units
		Funding and outcome goals are Year 5 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 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 6). HOME funds will be used to assist with providing 20 households access to new or rehabilitated rental units and providing 12 households opportunities for homeownership. For Plan Year 5, the State of Montana does not anticipate using HOME funds to address homelessness due to the availability of HOME-ARP funds and a one-time only \$5 million state-appropriation to fund Montana's new Emergency Shelter Facility Grant Program. Together, these resources support capital improvements for permanent supportive housing and emergency shelters servicing homeless individuals or families.

HTF will specifically provide funds to assist extremely low-income households (as listed in Table 6). HTF funds will assist with providing 20 households access to new or rehabilitated rental units and assisting 10 households who are homeless or at risk of homelessness with permanent housing.

CDBG funds will provide assistance to LMI households (as listed in Table 6). CDBG funds will assist with rehabilitating single-family and multi-family homes for 15 households and 10 households experiencing homelessness.

CDBG funds will provide planning opportunities to communities (as listed in Table 6). CDBG funds will assist in helping communities engage in comprehensive planning, such as for community development, physical infrastructure, resiliency, economic development, and preliminary project design. CDBG planning funds will aid local governments during this program year.

CDBG funds will provide public infrastructure assistance to communities (as listed in Table 6). CDBG funds will assist communities in constructing or rehabilitating wastewater facilities and systems, water treatment facilities and systems, and storm drain infrastructure that will predominantly assist low-to-moderate income households.

These funds will also help update and construct new community facilities, such as community centers, senior centers, and other vital community projects.

CDBG funds will provide economic development assistance to local small businesses to create new jobs and revitalize historic downtown businesses. A variety of these activities will primarily support low-to-moderate income residents.

ESG funds will be used to help families primarily through homeless prevention and rapid rehousing activities. The goal is to assist 100 households under each category. Homeless prevention funds can only help families who are considered extremely low income at or below 30% AMI, which is either at or below extremely low-income. ESG Rapid Rehousing 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 7. For information about the State's HOPWA program, funded via competitive award, please see Montana's HOPWA Annual Progress Report.

## Funding Allocation Priorities

*Table 7 – Funding Allocation Priorities*

Program allocations are estimates based on historical data and anticipated needs. Once HUD announces actual allocations, the funding allocation priorities in Table 7 will be adjusted proportionally.

Program	Goal										Admin	
	Preserve and Construct Affordable Housing		Plan for Communities		Improve and Sustain Vital Public Infrastructure		Revitalize Local Economies		Reduce Homelessness			
CDBG	\$1,150,000	19%	\$600,000	10%	\$2,587,331	42%	\$1,050,000	17%	\$500,000	8%	\$285,175	4%
HOME	\$2,700,000	90%	\$0	0%	\$0	0%	\$0	0%	\$0	0%	\$300,000	10%
HOPWA	N/A											
ESG	\$0	0%	\$0	0%	\$0	0%	\$0	0%	\$684,864.56	92%	\$59,553.44	8%
HTF	\$2,080,350	66%	\$0	0%	\$0	0%	\$0	0%	\$750,000.37	24%	\$314,483	10%

## Reason for Allocation Priorities

The State of Montana identified the allocation priorities set forth above for Plan Year 5 through the 2020-2024 Consolidated Plan Needs Assessment and Market Analysis, past experience administering the CDBG, HOME, and HTF 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 or near homeless Montanans have access in or near their communities. Funds are distributed based on a formula allocation for the state's 12 poverty districts, reflecting areas of poverty and general population, as set forth in Section 53-10-502, MCA, pertaining to the federal Community Services Block Grant. Each allocation of funds is based on poverty levels and general population in each service area, relative to the poverty and general population of the entire state. All subrecipients submit work plans, budgets, and reports outlining which of the allowable activities will be undertaken.

Note that the majority (\$7,159,501) of HOME-ARP funds were awarded to eligible applicants during Plan Year 4. The remaining \$3,154,291 will be awarded in Plan Year 5. As presented in Montana's HOME-ARP Allocation Plan, which is part of the 2021-2022 amended AAP, HOME-ARP funds are expected to be allocated for development or rehabilitation of non-congregate shelter (\$2,000,000), permanent housing (\$7,013,792), and supportive services (\$1,300,000) with the remaining to administer the program. To address the need for rehabilitation of single-family homes, the State of Montana received \$50 million under the American Rescue Plan Act (ARPA) for a Homeowner Assistance Fund. This program is actively accepting applications and can provide financial assistance, in the form of a grant to up to \$65,000, to assist homeowners in repairing or renovating health and safety risks within their home that may cause displacement such as trip/slip hazards, insurability repairs, accessibility and visit-ability, and other repairs that pose a hardship to homeowners.

## 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.

**Support existing Montana communities.** Montana will target CDBG, HOME, and HTF funding towards 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.

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

**Enhance Montana's economic competitiveness.** Montana is committed to utilizing economic opportunities as the primary strategy for poverty reduction. Montana will use CDBG funds to revitalize local economies; provide 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 LMI persons throughout the state.

**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, requiring, when feasible, access to broadband at assisted properties, and increasing homeownership and rental opportunities for eligible Montanans, particularly those who are homeless, disabled, elderly, or otherwise disadvantaged.

**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 Montanans who are homeless and/or those at risk of homelessness. Commerce will use CDBG, HOME, HTF, and ESG funds to provide permanent housing, shelter, and services for persons experiencing or at risk of homelessness. Activities may include operations and maintenance of shelters to be responsive to 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 those who are homeless or those at risk of homelessness throughout the state.

## **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 5. For purposes of providing more detailed information, the IDIS eCon Planning Suite System distribution method table (Table 8 – 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 5.

Montana distributes CDBG funds for eligible activities under the following categories: CDBG Affordable Housing Development and Rehabilitation; CDBG Housing Stabilization Program; CDBG Public and Community Facilities; CDBG Economic Development; and CDBG Planning. 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.

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 and Community 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**

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 CDBG National Objectives LMI, Slums and Blight, and 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 LMI National Objective, Montana will use CDBG funds (specifically, Planning and Economic Development resources) to reduce, eliminate, or prevent slums and blight.

Planning-only and Economic Development activities undertaken during the 2024-2025 AAP period will meet the LMI or Slums and Blight National Objectives by benefitting LMI persons or preventing or eliminating the presence of slums and blight. While up to this point, no Economic Development activities have proposed to or met the Slums and Blight National Objective, the need to prevent or eliminate the presence of slums and blight exists in communities across the state. The state is currently aiding planning activities that meet this National Objective. During the 2024-2025 AAP period, the State will educate and encourage communities to take the necessary steps to submit Planning and Economic Development grant applications for planning-only and revitalization activities that specifically meet the Slums and Blight National Objective.

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; however, the State does not use program income for administration and technical assistance.

To achieve the most effective and efficient use of CDBG funds, the Director of Commerce may reallocate up to 25% of the total CDBG allocation among 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 25% 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 of the 2020-2024 Consolidated Plan). 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.

### Urgent Need

If it is determined that CDBG funds are required to meet an urgent need, CDBG funds may be reallocated in the case of a disaster, and funds must be used immediately. In the event of a disaster, Commerce will follow its Citizen Participation Plan.

**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 (under certain

circumstances when undertaken with a qualified non-profit as part of community revitalization efforts), and rehabilitation of rental or homeownership units made available to households at or below 80% AMI.

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. Commerce provides 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*

<b>Ranking Criterion</b>	<b>Maximum Possible Points</b>
Community Planning	175
Need for Project	175
Project Strategy	150
Community Efforts and Citizen Participation	100
Benefit to Low- and Moderate-Income Persons	200
Implementation and Management	175
<b>Total Maximum Possible Points</b>	<b>975</b>

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 [housing.mt.gov/Community-Housing/CDBG-Housing](https://housing.mt.gov/Community-Housing/CDBG-Housing).

**Describe how resources will be allocated among funding categories:** For Plan Year 5, Montana will allocate an estimated \$1,150,000 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.

**Describe threshold factors and grant size limits.** Each project funded must meet the CDBG National Objective of benefiting persons of LMI or benefitting limited clientele. The maximum amount of CDBG funds to be awarded per project is detailed in the published CDBG Housing Development and Rehabilitation Application Guidelines.

**Anticipated Outcome Measure:** 10 rental units will be constructed or rehabilitated. In addition, approximately 10 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. 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. If

new construction of homes is in the scope of work for a community, it will partner with a Community Housing Development Organization or other Community Based Development Organization. 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 its 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 <https://housing.mt.gov/Community-Housing/CDBG-Housing>.

Describe how resources will be allocated among funding categories: For Plan Year 5, Montana will allocate an estimated \$500,000 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 accessibility improvements.

Anticipated Outcome Measure: 5 homeowners will be assisted.

State Program Name: CDBG Public and Community 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, 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.

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 and associated application materials. CDBG Facilities applications that provide support for a community service facility such as food banks, head start centers, nursing homes, etc. are reviewed via a competitive process based on application materials. 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 and Community Facilities Ranking Criteria*

<b>Ranking Criterion</b>	<b>Maximum Possible Points</b>
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
<b>Total Maximum Possible Points</b>	<b>1,125</b>

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 [comdev.mt.gov/Programs-and-Boards/Community-Development-Block-Grant-Program/Public-and-Community-Facilities](https://comdev.mt.gov/Programs-and-Boards/Community-Development-Block-Grant-Program/Public-and-Community-Facilities).

**Describe how resources will be allocated among funding categories:** For Plan Year 5, Montana will allocate \$2,587,331 in CDBG funds to Public and Community Facilities activities. The Public and Community Facilities allocation amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

**Describe threshold factors and grant size limits.** Each project funded must meet the CDBG National Objective of benefitting persons of LMI. The maximum amount of CDBG funds to be awarded is detailed in the published CDBG Public and Community Facilities Application Guidelines.

**Anticipated Outcome Measure:** Approximately LMI persons will be served with new or improved public infrastructure systems; approximately 1,000 LMI households will be served with access to new or improved community facilities that provide support services to LMI households.

**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).

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. 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 <https://comdev.mt.gov/Programs-and-Boards/Community-Development-Block-Grant-Program/Economic-Development>.

Describe how resources will be allocated among funding categories: For Plan Year 5, Montana will allocate \$1,050,000 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.

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. The maximum amount of CDBG funds to be awarded per project is detailed in the published CDBG Economic Development Application Guidelines.

Anticipated Outcome Measure: 30 jobs will be created or retained, and 2 businesses assisted.

State Program Name: CDBG 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 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 Planning applications that seek to complete activities in a designated Opportunity Zone may receive 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 <https://comdev.mt.gov/Programs-and-Boards/Community-Development-Block-Grant-Program/Planning-Activities>.

Describe how resources will be allocated among funding categories: For Plan Year 5, Montana will allocate \$600,000 in CDBG funds to Planning activities. Out of the total CDBG allocation, \$285,175 (\$100,000 + 1% + 2%) will be earmarked for State CDBG

administration and technical assistance. The Planning allocation amount is based on beneficiary data of the project area, the feasibility and need for the activity, and the availability of other federal or state resources for the activity.

**Describe threshold factors and grant size limits.** Each project funded must meet the CDBG National 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 at least 20 local governments.

**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 secure a first mortgage that meets responsible lending criteria. The home to be purchased must meet applicable property standards (Universal Physical Condition Standards (UPCS) or National Standards for the Physical Inspection of Real Estate (NSPIRE)). The purchase price for the property cannot exceed the purchase-price limits established and published annually by HUD. 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 <https://housing.mt.gov/Multifamily-Development/HOME-Program>.

**Describe how resources will be allocated among funding categories:** For Plan Year 5, the State of Montana will allocate \$200,000 in HOME resources to HOME Homebuyer Assistance Program activities. In addition, the State of Montana anticipates grantees will receive \$500,000 in program income for Plan Year 5; program income received is typically allocated to HOME Homebuyer Assistance Program activities. With prior approval from Commerce, some program income may be invested in housing development. 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 the purchase price limits published by HUD and presented in Table AP-3 below. Resale or recapture provisions must be placed on the HOME-assisted home for the applicable period of affordability, and projects must follow all applicable HOME regulations and guidelines for homebuyer assistance.


**COMMERCE**
*Table AP-3 – 2022 and 2023 HOME Purchase Price Limits*

<b>Metropolitan FMR Area Name</b>	<b>2023 Existing Single-Family Home</b>	<b>2023 Newly Constructed Single-Family Home</b>
Carbon County – Billings	\$319,000	\$361,000
Yellowstone County – Billings	\$319,000	\$361,000
Golden Valley County	\$209,000	\$361,000
Cascade County – Great Falls	\$247,000	\$361,000
Missoula County – Missoula	\$445,000	\$445,000
Beaverhead County	\$226,000	\$361,000
Big Horn County	\$209,000	\$361,000
Blaine County	\$209,000	\$361,000
Broadwater County	\$293,000	\$361,000
Carter County	\$209,000	\$361,000
Chouteau County	\$209,000	\$361,000
Custer County	\$209,000	\$361,000
Daniels County	\$209,000	\$361,000
Dawson County	\$209,000	\$361,000
Deer Lodge County	\$209,000	\$361,000
Fallon County	\$209,000	\$361,000
Fergus County	\$209,000	\$361,000
Flathead County	\$428,000	\$428,000
Gallatin County	\$466,000	\$466,000
Garfield County	\$209,000	\$361,000
Glacier County	\$209,000	\$361,000


**COMMERCE**

Granite County	\$233,000	\$361,000
Hill County	\$209,000	\$361,000
Jefferson County	\$323,000	\$361,000
Judith Basin County	\$209,000	\$361,000
Lake County	\$328,000	\$361,000
Lewis & Clark County	\$361,000	\$361,000
Liberty County	\$209,000	\$361,000
Lincoln County	\$257,000	\$361,000
McCone County	\$209,000	\$361,000
Madison County	\$285,000	\$361,000
Meagher County	\$209,000	\$361,000
Mineral County	\$238,000	\$361,000
Musselshell County	\$209,000	\$361,000
Park County	\$356,000	\$361,000
Petroleum County	\$209,000	\$361,000
Phillips County	\$209,000	\$361,000
Pondera County	\$209,000	\$361,000
Powder River County	\$209,000	\$361,000
Powell County	\$209,000	\$361,000
Prairie County	\$209,000	\$361,000
Ravalli County	\$404,000	\$404,000
Richland County	\$228,000	\$361,000
Roosevelt County	\$209,000	\$361,000
Rosebud County	\$209,000	\$361,000
Sanders County	\$261,000	\$361,000


**COMMERCE**

Sheridan County	\$209,000	\$361,000
Silver Bow County	\$219,000	\$361,000
Stillwater County	\$266,000	\$361,000
Sweet Grass County	\$211,000	\$361,000
Teton County	\$209,000	\$361,000
Toole County	\$209,000	\$361,000
Treasure County	\$209,000	\$361,000
Valley County	\$209,000	\$361,000
Wheatland County	\$209,000	\$361,000
Wibaux County	\$209,000	\$361,000

**Anticipated Outcome Measure:** 10 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, developer, 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://commerce.mt.gov/Housing/Community-Housing/HOME-Program>.

**Describe how resources will be allocated among funding categories:** For Plan Year 5, the State of Montana will allocate \$2,500,000 of its HOME resources to preserving and constructing affordable housing. \$300,000 or 10% of Plan Year 5 HOME funds will be used for administration and as explained above, \$200,000 of HOME funds and \$500,000 of HOME program income will be used for homebuyer assistance. The HOME Housing Development allocation amount is based on beneficiary data of the project area, and the feasibility and need for the activity. The State of Montana will not allocate any HOME resources to reducing homelessness in Plan Year 5 due to the availability of other federal or state resources for the activity, including HOME-ARP and ESFG funds.

**Describe threshold factors and grant size limits.** All funded HOME Housing Development activities must meet HOME requirements. Award amounts 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 annually by HUD.

**Anticipated Outcome Measure:** 12 rental or homeowner units will be constructed; 10 rental units will be 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 those who are homeless, disabled, elderly, or otherwise disadvantaged. 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 [commerce.mt.gov/Housing/Community-Housing/Housing-Trust-Fund](https://commerce.mt.gov/Housing/Community-Housing/Housing-Trust-Fund).

**Describe how resources will be allocated among funding categories:** For Plan Year 5, Commerce will allocate \$2,080,350 of its HTF resources to preserving and constructing affordable housing. \$314,483 or 10% of Plan Year 5 HTF funds will be used for administration with \$750,000.37 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:** 20 rental units will be constructed or 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.

ESG funds are allocated for the 12 poverty districts of Montana. based on a formula allocation, reflecting poverty and population in the area as relative to poverty and population in the entire state. This process is set forth in MCA Section 53-10-502, which pertains to the federal Community Services Block Grant (CSBG). Subrecipients are encouraged to develop sub-subrecipient relationships to expand services more effectively. Through this approach, agencies that work directly with clients served and

partners organizations in the area may establish work plans that meet the demand that they see on a daily basis, and the need that they have identified through a Needs Assessment process. All project types are eligible for agencies to use because they depend on local needs. Currently, 8 of Montana's HRDCs serve districts 5-12 DPHHS is currently engaged in a limited solicitation bid for districts 1-4.

**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 subrecipients 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. DPHHS will accept applications for the limited solicitation on a competitive basis. DPHHS 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 ESG program goals and objectives and ranking criteria. The ESG Program Policy Manual is available on DPHHS's website at [dphhs.mt.gov/Portals/85/hcsd/documents/ESGPolicyManual.pdf](http://dphhs.mt.gov/Portals/85/hcsd/documents/ESGPolicyManual.pdf).

**Describe how resources will be allocated among funding categories:** For Plan Year 5, Montana will allocate to ESG administration and to ESG program-specific activities for a total of \$744,418, which will include \$59,553.44 for administration of the program.

**Describe threshold factors and grant size limits.** ESG funds are distributed based on a formula allocation, reflecting poverty and population as set forth in MCA 53-10-502, pertaining to federal CSBG. DPHHS and subrecipient relationships are established through contracts. Subrecipients must develop work plans based on the need in their area. If the agency cannot fulfill all the identified highest needs, the agency establishes sub-subrecipient relationships with other organizations in their community, including nonprofits, community, and faith-based organizations.

**Anticipated Outcome Measure:** 350 individuals in 200 households will be served with rental assistance and housing relocation and stabilization services either through rapid rehousing or homeless prevention programs; 50 persons will be assisted with overnight shelter.

Montana, South Dakota, and North Dakota are ineligible to receive HOPWA formula funds due to population and need demographics, however, there still exists a need for such housing assistance in our communities. The three states organized a tri-state regional program named “Tri-State Housing Environments for Living Positively” 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.

## AP-35 Projects – (Optional)

### Introduction

All activities funded with CDBG, HOME, or HTF funds during Plan Year 5 must meet one of the project objectives presented in Table 9. Funds will be awarded through the processes described in AP-30 Methods of Distribution.

*Table 9 – 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-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.

Describe available grant amounts

Not applicable.

Describe how applications will be accepted

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.

Describe the 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

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, nonprofits and eligible developers to apply for HOME; and entitlement communities, nonprofits and eligible developers 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.

### 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 10.

*Table 10 – Geographic Distribution*

Target Area	Percentage of Funds
N/A	N/A

Rationale for the priorities for allocating investments geographically

Not applicable.

### Discussion

Not applicable.

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

### Introduction

Tables 11 and 12 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 11 – 1-Year Goals for Affordable Housing by Support Requirement*

<b>1-Year Goals for the Number of Households to be Supported</b>	
Homeless	120
Non-Homeless	57
Special-Needs	10
<b>Total</b>	<b>187</b>

*Table 12 – 1-Year Goals for Affordable Housing by Support Type*

<b>1-Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	100
The Production of New Units	32
Rehab of Existing Units	45
Acquisition of Existing Units	10
<b>Total</b>	<b>187</b>

## Discussion

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 combined with mortgages financed with proceeds from state-issued tax-exempt bonds.

## **AP-60 Public Housing - 24 CFR 91.320(j)**

### **Introduction**

The Department of Commerce Montana Housing Division includes the Rental Assistance Bureau, Montana's statewide Public Housing Authority. Montana Housing, as the statewide PHA, does not directly own or operate any public housing assets. However, Montana Housing does administer numerous federal rental assistance programs across the state, including the Housing Choice Voucher Program. The Bureau contracts with field agency partners, including HRDCs and other PHAs, on local administration of the HCV, Veterans Affairs Supportive Housing, Project-Based VASH, Mainstream, Emergency Housing Vouchers, and Moderate Rehabilitation Programs. 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. However, the Montana Housing Division is considering options for engaging local PHAs, including development of the next 5-Year Consolidated Plan, in the coming year. An area of considerable concern for Montana is HUD's methodology for Fair Market Rent calculations and resulting Voucher Payment Standard limits. Montana Housing and other local PHAs are struggling with voucher utilization, with landlords opting out of the program due to the economics of Payment Standards limitations and their ability to rent to non-voucher holders at higher market rents. The Montana Housing Division is also seeking to

collaborate with local PHAs on the physical condition and rehabilitation needs of local PHA public housing stock.

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. See AP-30 Methods of Distribution. Homeless and other special needs will also be addressed through HOME-ARP and ESGF funds, the majority of which were awarded during Plan Year 4. HOME-ARP activities will increase capital available for development of non-congregate shelter and permanent supportive housing, as well as supportive services to benefit Qualifying

Populations. ESFG activities will support capital improvements in seven Montana counties, allowing for the development or rehabilitation of congregate and non-congregate emergency shelter facilities and delivery of supportive services.

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 a lack of affordable housing options. However, market rent increases appear to be a primary driving factor in recent rises in homelessness, particularly acute in higher cost areas that experienced rapid rent increases during the COVID-19 era. Every \$100 increase in median rent is associated with a 9 percent increase in the estimated homelessness rate, according to a 2020 report by the U.S. Government Accountability Office. Many households experiencing homelessness double up with family, friends, or 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 and encourage activities that increase the level of assistance to programs serving special needs groups including those at risk of homelessness. This includes supporting activities to reduce homelessness and encouraging the development and rehabilitation of non-rental facilities for the shelter and transition of temporarily homeless Montanans. Additionally, HOME, CDBG, HTF, and ESG will continue to support efforts by local governments and partner organizations providing permanent supportive housing, 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 Point-in-Time counts of homeless, unduplicated, one-night estimates of both sheltered and unsheltered homeless populations, occurring during the last week in January of each year. One finding from that survey is that a 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, HOME-ARP, ESFG, 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)

- 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*

Montana supports transitional housing for homeless families seeking permanent housing and independent living. Several assisted housing development projects in Montana's portfolio provide transitional housing and supportive services. Furthermore, grantees serving homeless persons in Montana participate in the State's Coordinated Entry System, which identifies the most appropriate housing resources to facilitate homeless households' rapid and permanent exit from homelessness and prioritizes the most vulnerable households. Under the Coordinated Entry System, service providers work together as a housing and service collaborative, reducing duplication of services, effectively delivering services, and strategically utilizing resources.

Although the State does not know whether it will receive CDBG, HOME, or HTF applications for activities that specifically serve homeless persons, the State prioritizes funding for activities that address special and critical needs, including those experiencing homelessness. HOME-ARP funds will specifically benefit Qualifying Populations, and state ESFG funds will also serve those experiencing homelessness.

See the 2020-2024 Consolidated Plan for a more in-depth discussion of the needs of homeless persons in Montana.

*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 NOFO. 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 subrecipients 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 typically the local Community Action Agencies (CAAs) and have good relationships with other service providers, 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.

Montanans who have experienced job loss or extreme increases in rent 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 5, HTF funds will also support homeless prevention activities by increasing and preserving the supply of permanent rental housing for extremely low-income households, particularly the homeless, disabled, elderly, and other disadvantaged populations. Furthermore, HOME-ARP funds will expand the supply of homes that benefit Qualifying Populations and ESFG funds are supporting health, safety, accessibility upgrades to emergency shelters and/or expansion of new shelter space.

## Discussion

See SP-60 Homelessness Strategy in the 2020-2024 Consolidated Plan for more information about Montana's strategy for reducing homelessness 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**

Local jurisdictions and the State Legislature determine land use controls, tax policies, zoning ordinances, building codes, fees and charges, growth limitations, and other policies and laws affecting affordable housing. Commerce and DPHHS encourage local jurisdictions and the State Legislature to consider possible impacts to affordable housing when updating policy and enacting laws. Furthermore, both agencies are committed to providing technical assistance to local governments and nonprofit organizations, so they are in the best position to take maximum advantage of HUD and the Montana Board of Housing programs to maintain a supply of, and facilitate the creation of new, 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 of the 2020-2024 Consolidated Plan), and 2020 Housing and Community Development Survey (Appendix B of the 2020-2024 Consolidated Plan).

Participants in Commerce’s housing focus groups (Appendix C of the 2020-2024 Consolidated Plan) outlined several barriers to affordable housing development, including:

- Capacity challenges at all levels (from the State to grantees and partners)

- 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 labor, building materials and infrastructure
- 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

Although removing or ameliorating barriers to affordable housing falls primarily to local jurisdictions and the State Legislature, Commerce requires its CDBG, HOME, and HTF grantees with projects consisting of five or more units to develop project-specific Affirmative Fair Housing Marketing Plans. An approved AFHMP is one element of the special conditions of Commerce's contracts with grantees, and staff monitor compliance during CDBG, HOME, and HTF project visits.

Commerce is newly assessing barriers to affordable housing as part of its development of the 2025-2029 Consolidated Plan and associated Equity Plan. This action will provide important data to all stakeholders working to remove and ameliorate the negative effects of public policies currently serving as barriers to affordable housing and fair housing choice.

## Discussion

The State will continue to use its resources to inform local jurisdictions and the State Legislature as they perform their duty to address barriers to affordable housing.

In July 2022, Governor Gianforte issued Executive Order No. 5-2022 creating the Housing Advisory Council, also known as the Governor’s Housing Task Force. The purpose of the Task Force was to “provide the Governor with short- and long-term recommendations and strategies for the State of Montana to increase the supply of affordable, attainable workforce housing.” This 30-member, bipartisan Task Force was directed to provide two written reports. First, a written report by October 15, 2022 “with recommendations and strategies to increase the supply of affordable, attainable workforce housing, specifically focusing on measures the Legislature could consider and the Governor could sign into law.” Second, a written report by December 15, 2022 “with recommendations and strategies to increase the supply of affordable, attainable workforce housing, specifically focusing on regulatory changes and best practices that could be adopted by state agencies and local governments.”

As a result of the Task Force recommendations and a broad, bipartisan coalition, the State of Montana 68th Legislature passed a suite of significant land use and zoning ordinance bills, which were recently signed into law. These bills include but are not limited to:

- Montana Land Use Planning Act, which requires local governments to plan for future housing needs and adopt pro-housing zoning reforms.
- Revise zoning laws related to Accessory Dwelling Units (ADUs), to give landowners more freedom to respond to housing needs.
- Allow for duplex, triplex, and fourplex housing in city zoning, to end exclusionary zoning and increase access to starter homes and “missing middle” housing.
- Revise municipal zoning to allow multifamily and mixed-use development, to build denser homes in urban areas and protect our open spaces from sprawl.

The Governor’s Housing Task Force reconvened in October 2023 and is currently evaluating successes from the 68th Legislative session, including local government implementation of land use reforms to comply with new state laws, as well as identifying remaining challenges. The Task Force will produce another report later in 2024 with additional recommendations. Some areas of focus have included parking reforms, minimum lot sizes, litigation against the state and/or municipalities over allowing housing, allowing for one staircase in multifamily residential construction, legalizing micro-units/co-housing, and additional financing tools to support infrastructure for new housing growth.

## **AP-85 Other Actions – 91.320(j)**

### **Introduction**

The following are actions planned for Plan Year 5 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 and rehabilitating existing 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 lead-based paint (LBP) hazards and comply with current requirements of Title X of the Residential Lead Based Paint Hazard Reduction Act of 1992, HUD's Lead Safe Housing Rule and other applicable federal laws and regulations. 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, LSHR, or NSPIRE inspections are performed on all homes (renter or owner-occupied) assisted with HTF, HOME, Section 8, and other public funds.

UPCS or NSPIRE inspections, as applicable, are also conducted on all homes purchased with HOME assistance prior to the commitment of HOME funds. State staff conducting UPCS or NSPIRE inspections complete relevant trainings 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 lead in drinking water

With federal funding from the American Rescue Plan Act of 2021 and the Infrastructure Investment and Jobs Act of 2021, the State is engaging in cross-agency efforts to reduce lead in schools and public drinking water systems. Commerce is using ARPA funding and working with the Montana Department of Natural Resources and Conservation and the Montana Department of Environmental Quality to provide technical assistance to schools to identify the presence of lead in facility plumbing and identify and obtain funding for its permanent removal or treatment. In addition, Commerce is using IIJA funding and working with DEQ to perform inventories of the presence of lead in the drinking water service lines that connect residential properties to public drinking water systems to prepare communities to apply for IIJA funding to replace lead service lines permanently eliminating one of the most complicated remaining sources of lead in drinking water. Though the presence of lead in drinking water is ubiquitous across Montana communities, low-to-moderate income persons are disproportionately affected by continued exposure and have fewer resources for its removal.

As required per 24 CFR 93.301(f)(xiii), before completion of HTF-assisted properties, property owners must provide documentation from a licensed architect that no lead pipes or solder were used in the project activities.

### 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 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 of the 2020-2024 Consolidated Plan 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 those who are homeless, disabled, elderly, or otherwise disadvantaged. 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 5, 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 participates in the MTCoC and collaborates with DPHHS on efforts to provide tenancy support services for HEART Medicaid waiver recipients.

## Discussion

The State of Montana is committed to addressing critical needs, and to this end, during Plan Year 5, will undertake the actions outlined above.

### **Anti-Displacement and Relocation Assistance Plan**

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

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, 24 CFR

93.352 and 24 CFR 82.353 for CDBG, HTF, and HOME, respectively. 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 LMI dwelling units demolished or converted to a use other than as LMI housing. The one-for-one replacement requirement will not apply if the HUD finds there is an adequate supply of available, vacant LMI dwelling units in standard condition in the area.
  5. Commerce will require CDBG, HTF, and HOME recipients to provide benefits to any person involuntarily and permanently displaced as a result of CDBG-, HTF-, and/or HOME-funded activities in accordance with the Uniform Relocation Assistance and Real Property Act.
  6. Commerce will require all CDBG, HTF, and HOME recipients to certify that they will comply with both this and their own residential anti-displacement and relocation assistance plan.

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

### **Introduction**

This section of the AAP outlines specific requirements of Montana’s CDBG, HOME, ESG, and HTF programs.

## Community Development Block Grant Program

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
<b>Total Program Income:</b>	<b>\$0</b>

### 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%

2022, 2023, and 2024 are the years covered in this AAP.

## **HOME Investment Partnership Program**

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:*

State recipients and subrecipients are eligible entities (entities) to carryout HOME-assisted homebuyer activities. Whether Commerce's grantees use recapture or resale provisions for their homebuyer activities depends on the type of activity as well as the structure of the program. Down payment and closing cost assistance programs that provide HOME funds directly to homebuyers are required to use recapture provisions unless the grantee will add the assisted home to a community land trust. If long-term affordability will be ensured through a land trust, resale provisions will be used. 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 for 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 their 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 applicable 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*

<b>HOME Assistance to Buyer</b>	<b>Period of Affordability</b>
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 their 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 their 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.

#### *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 as measured by the Federal Housing Finance Agency. The

change in the Housing Price Index 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.

### *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**

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.

Subrecipients receive 92.5% of the grant funds. DPHHS retains 2.5% for administrative costs. 5% of the grant is retained for HMIS costs.

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)
- 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. All subrecipients 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 NOFO. 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.

The ESG Program Policy Manual is available on the DPHHS website at [dphhs.mt.gov/Portals/85/hcsd/documents/ESGPolicyManual.pdf](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, occurred simultaneously with the rollout of a new HMIS; both launched in earnest in September 2018. Earlier versions of Coordinated Entry System were largely paper-based; these were fully integrated into the new Homeless Monitoring Information System including a custom built By-Name-List. The MTCoC board designated the new HMIS Vendor and Lead (Pathways MISI) to also be the statewide Coordinated Entry System Lead. While the MTCoC is structured around 12 districts, Coordinated Entry System 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 Coordinated Entry System 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 Coordinated Entry System 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 Homeless Management Information System/ Coordinated Entry System Lead conducts monthly Coordinated Entry System 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).*

All subrecipients must submit work plans, budgets, and reports outlining which of the allowable activities will be undertaken for approval, 8 Human Resource Development Councils representing districts 5-12 have subaward agreements with DPHHS to conduct ESG activities. Districts 1-4 are currently open for limited solicitation bids. DPHHS will accept applications for the limited solicitation on a competitive basis. DPHHS will then prioritize project proposals from eligible entities through a ranking process. Community and faith-based organizations may apply. Applications will be ranked to determine how closely a project aligns with the intent of the ESG program goals and objectives and ranking criteria ESG funds are allocated based on a formula allocation for the state's 12 poverty districts, reflecting areas of poverty and general population, as set forth in Section 53-10-502, MCA, pertaining to the federal Community Services Block Grant. Each allocation of funds is based on poverty levels and general population in each service area, relative to the poverty and general population of the entire state.

*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.*

- 100 households avoided eviction or losing their primary residence.
- 100 unhoused households were placed in housing.
- 50 households were provided with a shelter bed

Reporting of services and outcomes are submitted annually through the CAPER 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:

- Applications submitted by eligible recipients
- Subgrantees that are State Agencies
- Subgrantees that are HUD-CPD entitlement grantees

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

Montana does not distribute HTF funds through grants to subgrantees.

*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 include developers and nonprofit organizations. HTF recipients are eligible to apply for HTF funding, alone or in partnership. 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, Community Housing Development Organizations, Human Resource Development Councils, 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.

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

Eligible applicants must also provide signed certifications, supporting documentation, budget, implementation schedule, management plan, market analysis, and other documents that may include a Preliminary Architectural Report or Capital Needs Assessment 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.

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
- 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 does consider geographic distribution across the state when awarding HTF funds and awards additional points for projects in under-resourced areas of the state.

*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. As part of that demonstration, the applicant will be required to describe and document:

- The need for any request for HTF Operating Assistance funds
- 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 recipient 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 HTF award will only be an amount necessary to provide quality affordable housing that is financially viable for at least the statutorily required period of affordability
- The sources and uses of funds (including any operating cost assistance and reserves) for the project are reasonable and will not provide undue benefit to the developer or owner(s)

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

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

Yes                       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".

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.

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 per unit cost limits, HOME’s maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits, 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 were effective April 7, 2023, and subject to change based on HUD’s annually published bases.

*Table AP-5 – HOME and HTF Maximum per Unit Subsidies*

<b>Bedrooms</b>	<b>Base<sup>1</sup></b>	<b>Total Subsidy</b>
0	\$72,088 X 240%	\$173,011
1	\$82,638 X 240%	\$198,331
2	\$100,490 X 240%	\$241,176
3	\$130,002 X 240%	\$312,005

<sup>1</sup> <https://www.hudexchange.info/news/hud-publishes-limits-for-home-maximum-per-unit-subsidies/>

4+	\$142,701 X 240%	\$342,482
----	------------------	-----------

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 in the 2020-2024 Consolidated Plan).

The recipient and subgrantee will be required to follow all rehabilitation standards as set forth in 24 CFR 93.301(b) and Appendix J of the 2020-2024 Consolidated Plan, 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

Rehabilitation standards for housing units rehabilitated with HTF funds will be updated to comply with NSPIRE according to HUD's requirements and established timelines.

#### 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 HTF award 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 those who are homeless, disabled, elderly, or otherwise disadvantaged.*

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.