

Montana's Draft Fair Housing Equity Plan Associated with the 2025-2029 Consolidated Plan

Public Hearing

September 10, 2024

10:00 a.m. – 11:00 a.m.



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2025-2029 Consolidated Plan

Statewide Planning

The State of Montana, through the Departments of Commerce and Public Health & Human Services, is developing a 5-year plan to guide policy and investment for housing, economic, and other community development projects.

This 5-year plan, also known as the “**Consolidated Plan for Housing and Community Development**,” is required by the U.S. Department of Housing and Urban Development to assess Montana’s needs and current conditions, as well as to determine priorities and allocate HUD funding.



2025-2029 Consolidated Plan Statewide Planning

In conjunction with the Consolidated Plan, Montana has developed an **Equity Plan** to affirmatively furthering fair housing.



2025-2029 Consolidated Plan

Equity Plan

- **Equity Plan for Affirmatively Furthering Fair Housing**
 - Under a HUD Proposed Rule, Montana will develop an Equity Plan every five years that will serve the purpose of assessing fair housing issues and their underlying causes, as well as setting fair housing goals and outlining strategies for achieving equity in housing, increasing access to community assets, and broadening economic opportunities
 - The mandate to affirmatively further fair housing requires proactive and meaningful action to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination



2025-2029 Consolidated Plan

Public Participation

- Focus groups
- Public hearings
- Surveys
 - Housing and Community Needs
 - Fair Housing
- Documents
 - Formal reviews with public comment periods

See website for current information.

commerce.mt.gov/Consolidated-Plan/Updates



2025-2029 Consolidated Plan Objectives

- The objectives of Montana's Consolidated Plan include:
 - Provide decent housing
 - Provide a suitable living environment
 - Expand economic opportunities



2025-2029 Consolidated Plan

Goals

- The goals of Montana's current Consolidated Plan are:
 - Goal 1 – Preserve and Construct Affordable Housing
 - Goal 2 – Plan for Communities
 - Goal 3 – Improve and Sustain Public Infrastructure
 - Goal 4 – Revitalize Local Economies
 - Goal 5 – Reduce Homelessness



2025-2029 Consolidated Plan Programs

- **Community Development Block Grant**
 - Housing (Rental Development / Single Family Rehabilitation), Public and Community Facilities, Economic Development, Planning
- **HOME Investment Partnerships Program**
 - Rental Development / Single Family Development / Rental, Rehabilitation, Homebuyer Assistance
- **Housing Trust Fund**
 - Rental Development / Rental Rehabilitation
- **Emergency Solutions Grant**
 - Street Outreach / Emergency Shelter / Homelessness Prevention / Rapid Re-housing



2025-2029 Consolidated Plan Planning Process

- Analyze quantitative and qualitative data regarding need
- Engage the public, agencies, and stakeholders to get input about need
- Identify priority needs
- Develop a strategy in response to identified needs
- Direct funding to strategies



2025-2029 Consolidated Plan Documents

- **Five-Year Consolidated Plan for Housing and Community Development**
 - Consolidated Plans are strategic plans prepared every five years that guide housing and community investments
- **Annual Action Plan**
 - AAPs are prepared each year of the Consolidated Plan and outline specific activities, goals, and objectives for the given program year
- **Consolidated Annual Performance and Evaluation Report**
 - CAPERs are annual reports that detail use of funds and progress towards meeting goals and objectives for AAPs



2025-2029 Consolidated Plan Equity Plan Development

Under HUD's Proposed Rule, the State will oversee a more streamlined analysis of fair housing compared to what was required under the 2015 Affirmatively Furthering Fair Housing Rule. Furthermore, the State will oversee a more robust community engagement effort to identify fair housing needs and opportunities.



2025-2029 Consolidated Plan Equity Plan Development (cont'd)

- At least three public hearings will be held before the Equity Plan is submitted to HUD.
 - Two hearings *before* the publication of the Equity Plan to provide the public opportunity to identify fair housing needs and inform fair housing strategies.
 - First hearing was April 3, 2024, and the second hearing was June 20, 2024
 - One hearing *after* the publication of the Equity Plan to provide the public opportunity to comment on the published plan document (today, Sept. 10, 2024).
- As part of its outreach efforts, the State gathered data to inform Equity Plan development via the Montana Fair Housing Survey.
 - Opened May 1, 2024; closed May 31, 2024.



2025-2029 Consolidated Plan Equity Plan Development (cont'd)

- **Fair Housing Analysis**

- Demographics
- Segregation and integration
- Racially or ethnically concentrated areas of poverty
- Access to community assets
- Access to affordable housing opportunities
- Access to homeownership and economic opportunity
- Local and state policies and practices impacting fair housing

- **Fair Housing Issues**

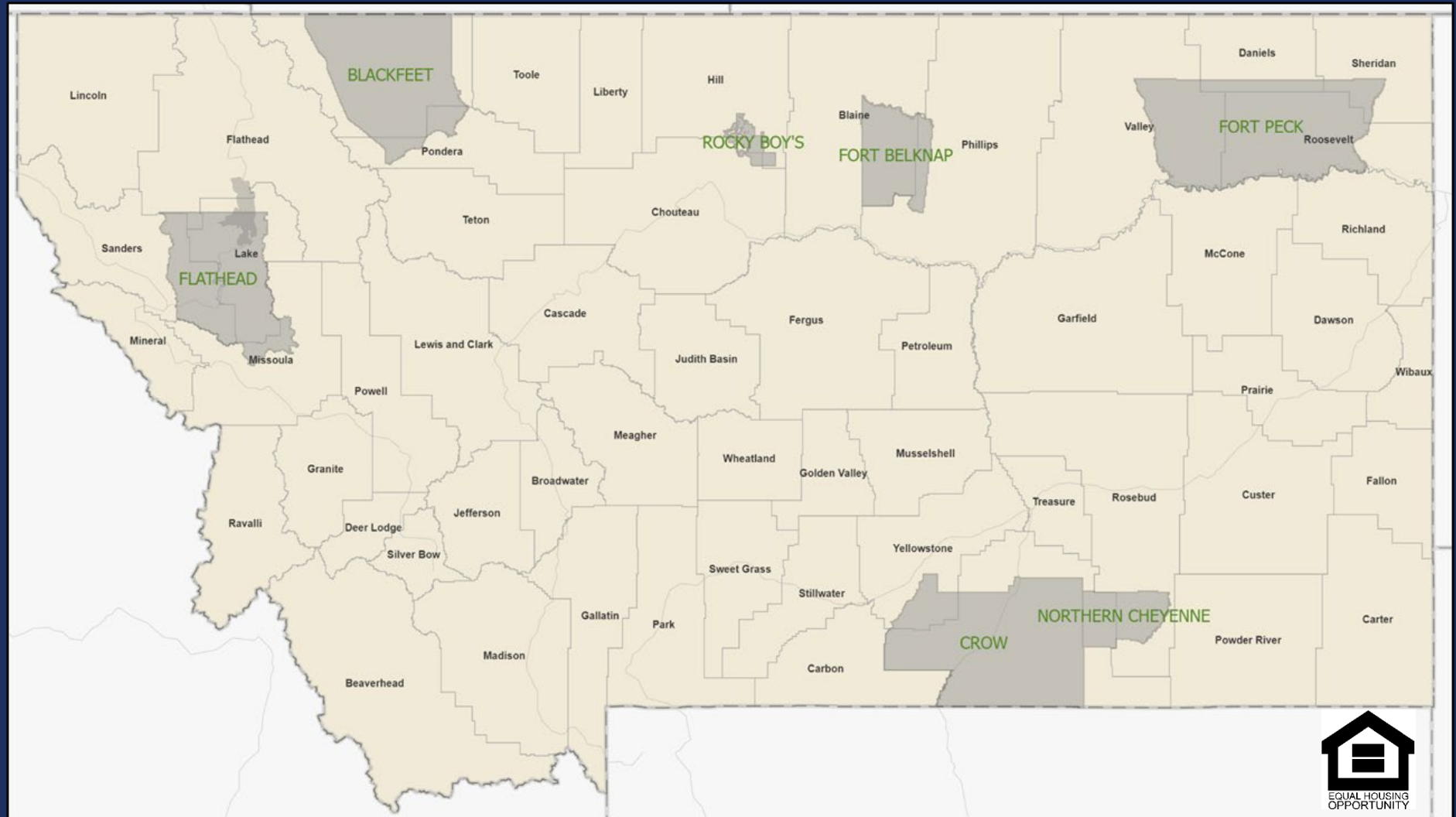
- Identify issues with data and local knowledge
- Prioritize issues based on data collected and public input

- **Fair Housing Strategies and Goals**

- Commit to taking responsive actions to address fair housing issues



2025-2029 Consolidated Plan Equity Plan Development (cont'd)



2025-2029 Consolidated Plan

Equity Plan Development (cont'd) Data - Demographics



Race/Ethnicity	1990 Trend		2000 Trend		2010 Trend		2020	
	#	%	#	%	#	%	#	%
White	556,529	91.4%	618,450	89.2%	666,393	87.8%	657,407	83.3%
Black	1,103	0.2%	2,275	0.3%	4,179	0.6%	2,648	0.3%
Hispanic	7,969	1.3%	11,912	1.7%	19,169	2.5%	28,565	3.6%
Asian or Pacific Islander	2,432	0.4%	4,558	0.7%	7,104	0.9%	5,371	0.7%
Native American	40,296	6.6%	54,443	7.9%	61,823	8.1%	53,132	6.7%
Data Source: AFFH, Census, ACS						Non-Entitlement Areas of Montana		



2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Data - Demographics



Disability Rate		
Age	2015	2022
Under 5 years	1.0%	0.9%
5 to 17 years	4.6%	5.7%
18 to 34 years	6.4%	8.4%
35 to 64 years	13.7%	13.3%
65 to 74 years	25.5%	25.0%
75 years and over	49.5%	45.9%
Data Source: 2015 and 2022 5-Year ACS		State of Montana

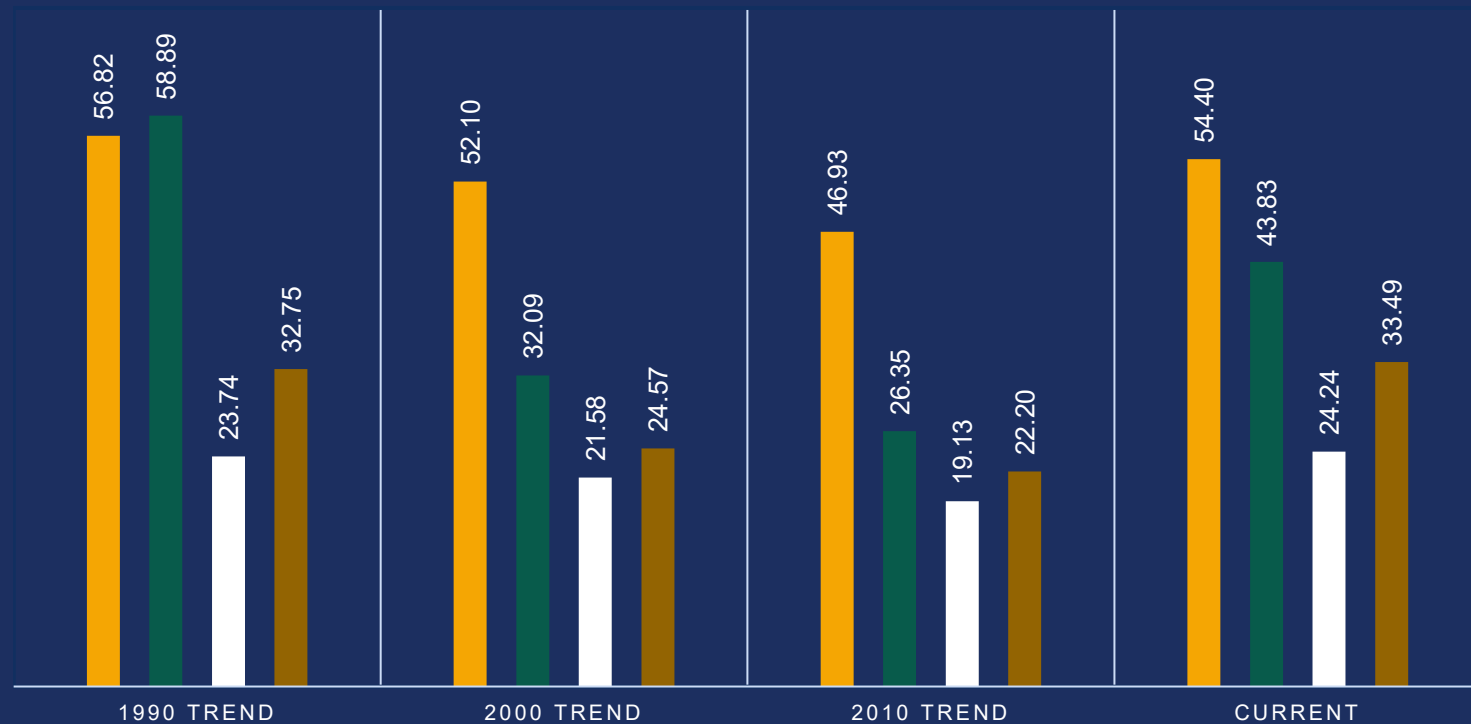


2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Data - Segregation

■ Non-White/White
 ■ Black/White
 ■ Hispanic/White
 ■ Asian or Pacific Islander/White



Dissimilarity Index	
Low Segregation	<40
Moderate Segregation	40-54
High Segregation	>55

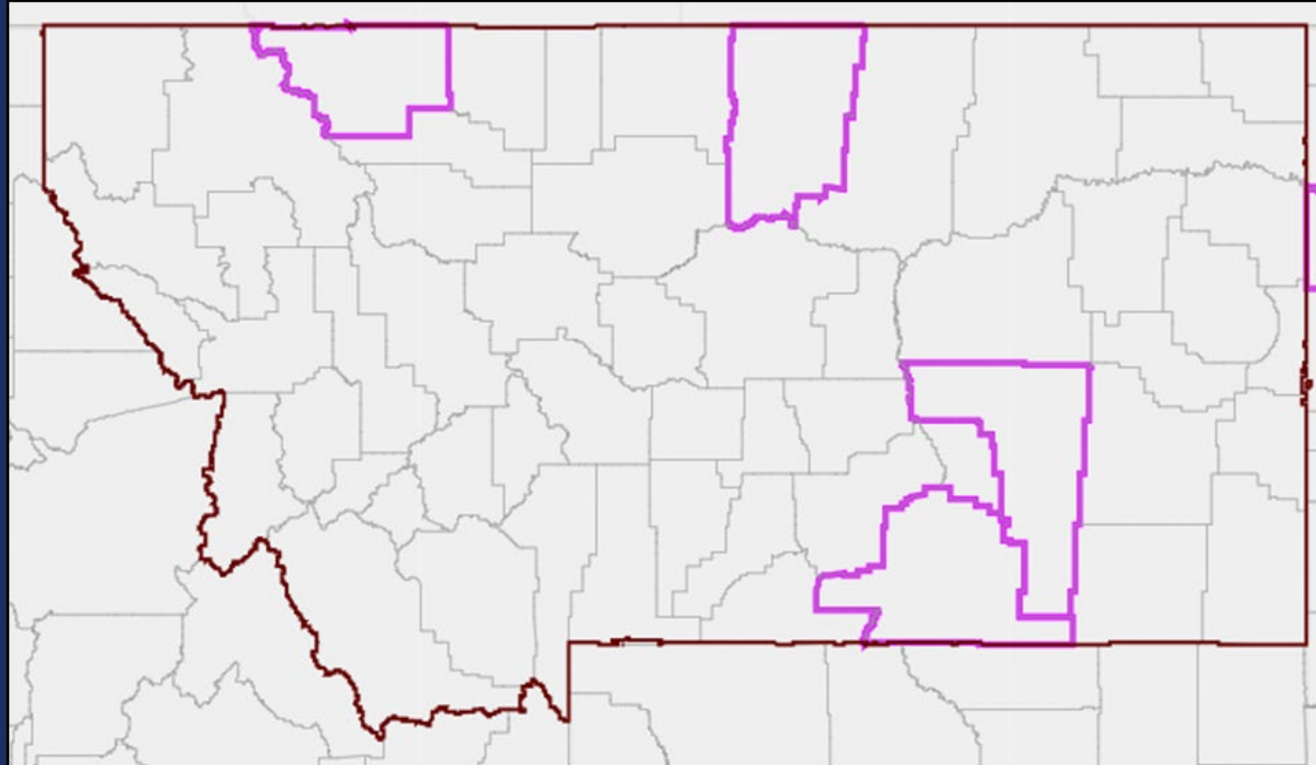
Racial/Ethnic Dissimilarity Index



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Equity Plan Development (cont'd)

Data – R/ECAPs



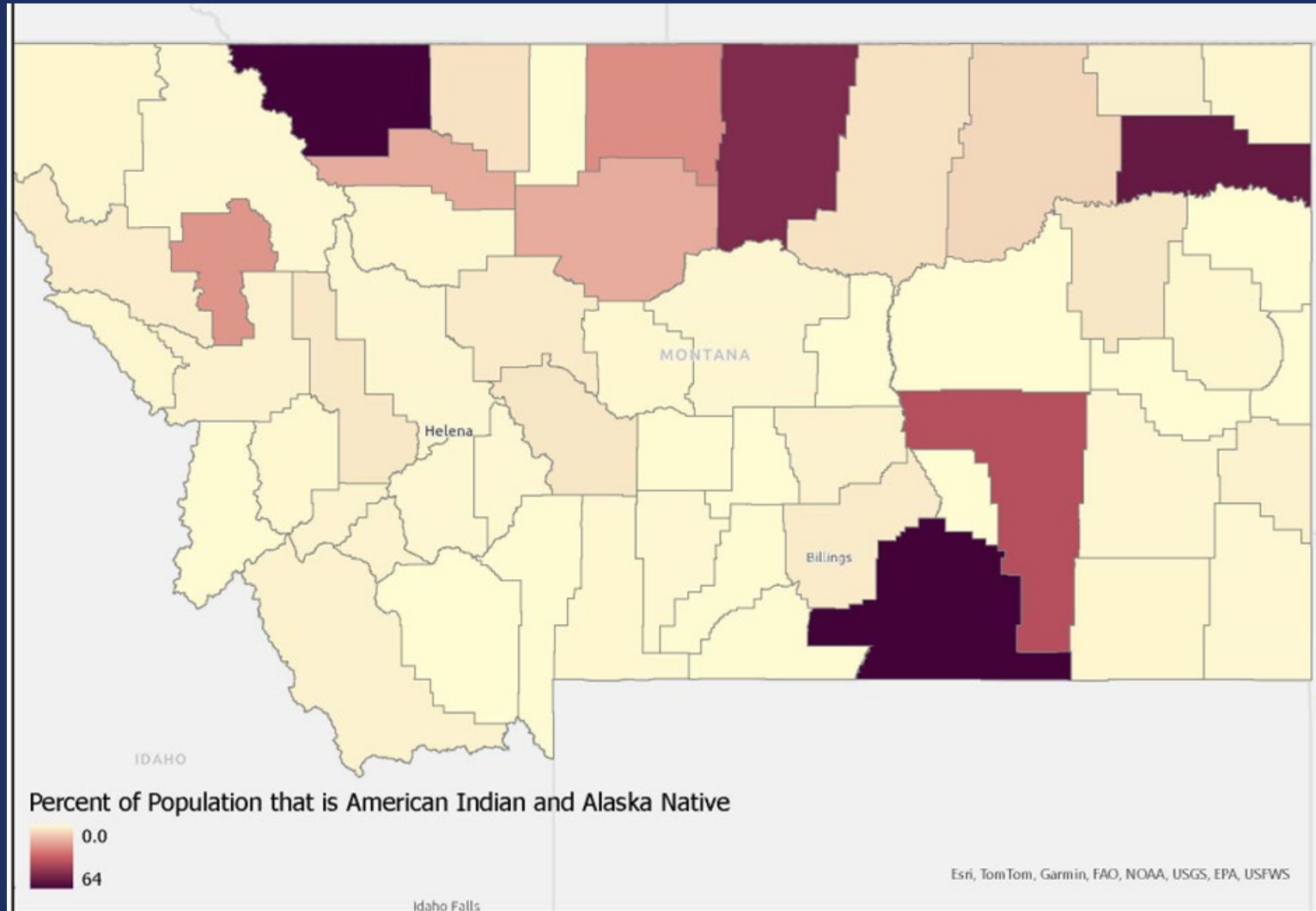
Racially/Ethnically Concentrated Areas of Poverty



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Equity Plan Development (cont'd)

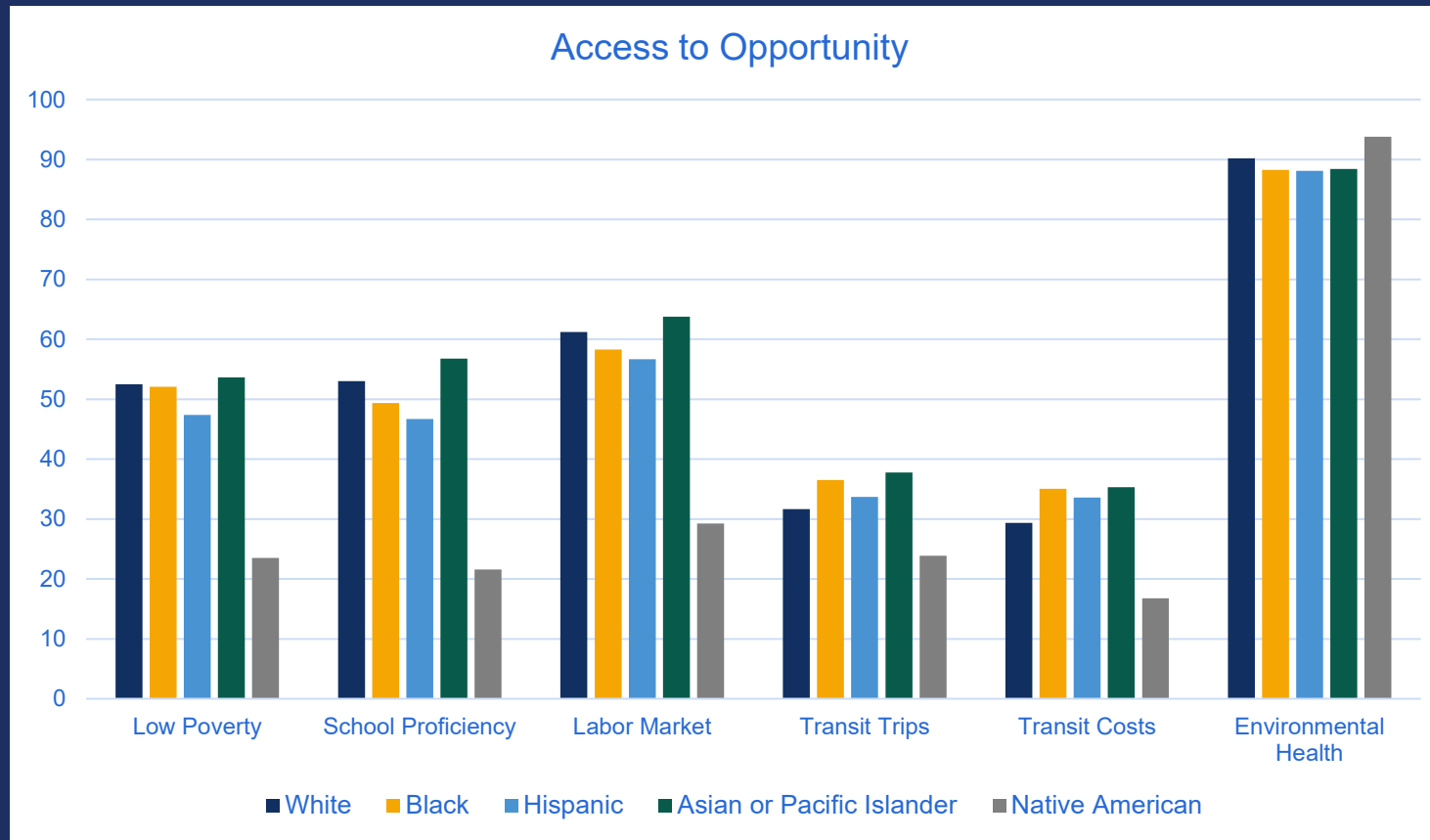
Data – R/ECAPs



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Equity Plan Development (cont'd)

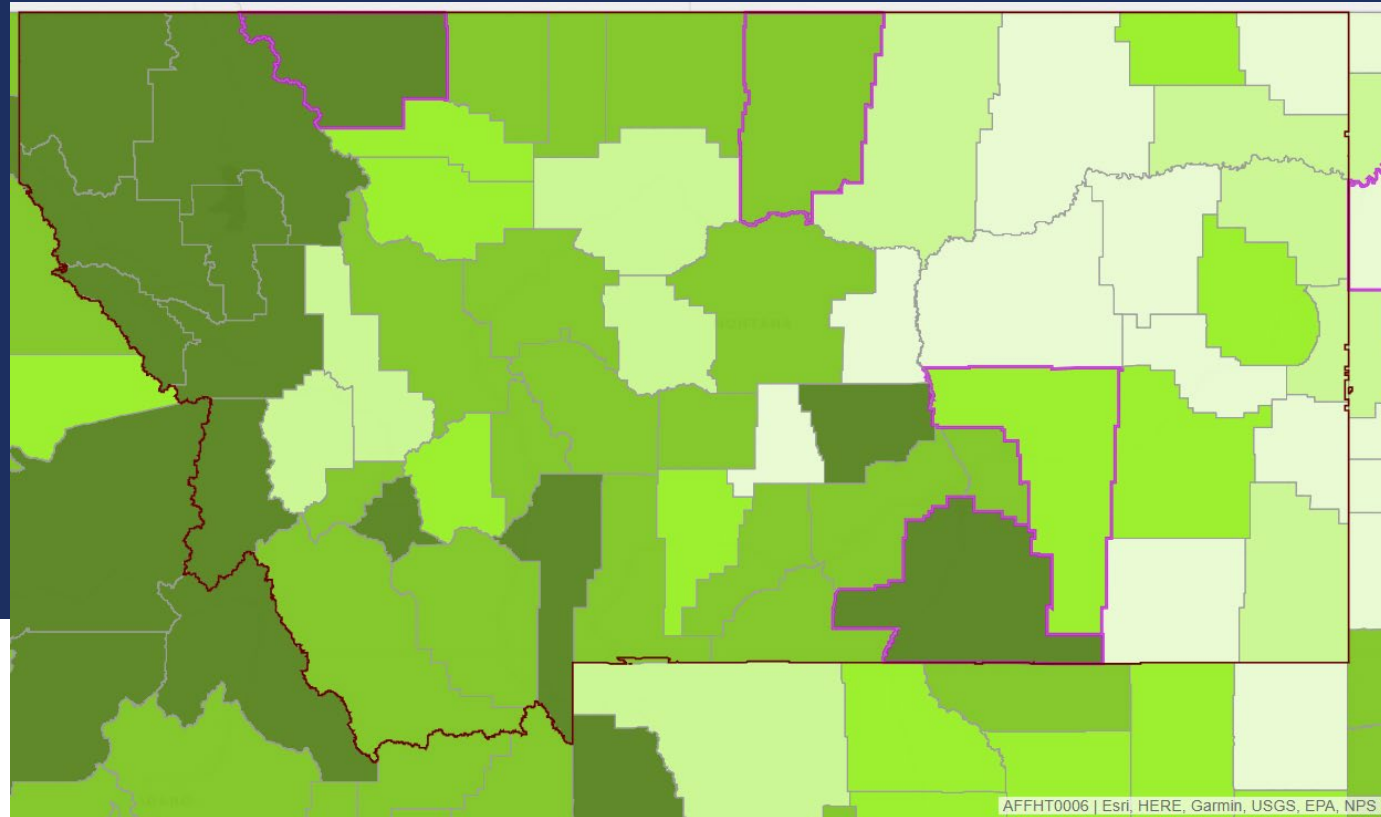
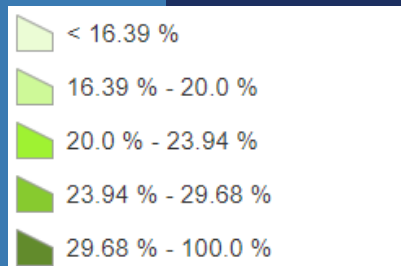
Data – Access to Opportunities



2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Data – Access to Affordable Housing



Percent of Total Households with Any of the Four Housing Problems



2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Data – Access to Affordable Housing



Cost Burdens		
Montana	Owner	Renter
Cost Burden	12.0%	19.6%
Severe Cost Burden	8.2%	18.7%
Total	20.1%	38.3%
Data Source: 2022 5-Year ACS		State of Montana

Percent of Total Households with Any
of the Four Housing Problems



2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Data – Access to Homeownership



Mortgage Denial Rates by Race					
Race or Ethnicity	2018	2019	2020	2021	2022
American Indian or Alaska Native	23.6%	23.0%	17.5%	16.7%	26.1%
Asian	13.7%	15.4%	14.1%	9.8%	16.8%
Black or African American	16.5%	24.0%	14.9%	15.8%	22.3%
Native Hawaiian or Other Pacific Islander	11.8%	16.0%	26.8%	6.7%	26.2%
White	13.3%	12.0%	9.2%	9.7%	13.6%
Two or More Races	21.4%	23.8%	13.6%	12.8%	42.1%
Not Available	7.8%	6.8%	7.0%	7.8%	10.2%
Total	12.4%	11.2%	8.9%	9.4%	13.1%
Data Source: HMDA Data			State of Montana		



2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Data – Access to Economic Opportunities



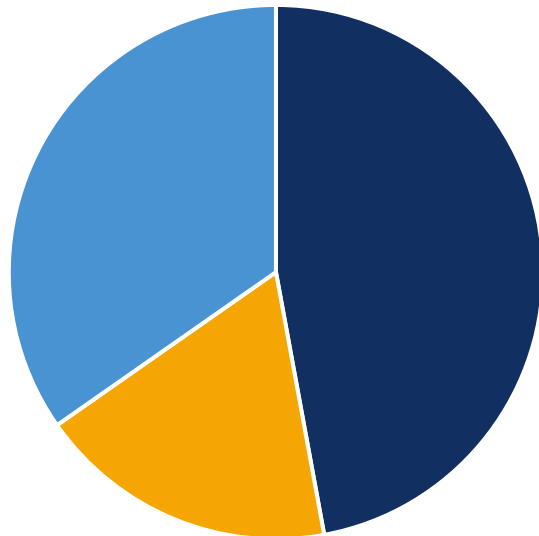
Poverty by Race and Ethnicity	
Race and Ethnicity	% in poverty
White	10.7%
Black or African American	17.1%
American Indian and Alaska Native	35.1%
Asian	12.9%
Native Hawaiian and Other Pacific Islander	4.5%
Some other race	17.0%
Two or more races	15.0%
Hispanic or Latino origin (of any race)	17.0%
Data Source: 2022 5-Year ACS	State of Montana

Poverty by Disability Status	
Disability Status	% in poverty
With any disability	19.1%
No disability	11.3%
Data Source: 2022 5-Year ACS	State of Montana



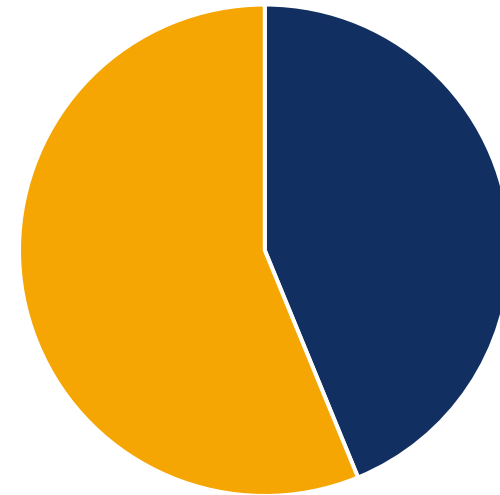
2025-2029 Consolidated Plan Equity Plan Development (cont'd) Survey

Are you aware of fair housing laws in Montana?



■ Yes ■ No ■ Somewhat

Are you aware of any policies to promote affordable housing development in your community?



■ Yes ■ No

2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Fair Housing Issues

Issue 1:

Barriers for American Indian Households to Access Housing and Community Assets

- 1.1: Disproportionately Less Access to Mortgages for American Indian Applicants
- 1.2: Disproportionately Higher Rates of Poverty for American Indians
- 1.3: Lower Levels of Access to Community Assets for American Indians
- 1.4: R/ECAPs Occur in Communities with American Indian Poverty

Issue 2:

Barriers for Low-Income Households to Access Housing

- 2.1: Higher Rates of Cost Burden for Low-Income Households

Issue 3:

Barriers for Renter Households to Access Housing

- 3.1: Renter Households Face Higher Rates of Cost Burdens Statewide



2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Fair Housing Issues

Issue 4:

Barriers for Seniors and Households with Disabilities to Access Housing

- 4.1 Senior Households and Households with Disabilities Face Increased Levels of Housing Need Statewide

Issue 5:

Barriers to Providing Adequate Community Support

- 5.1: Lack of Resources
- 5.2: Lack of Federal-Level Data
- 5.3: Lack of Fair Housing Knowledge
- 5.4: Institutional Barriers
- 5.5: State and Local Barriers



2025-2029 Consolidated Plan Equity Plan Development (cont'd) Fair Housing Goals

Goal 1: **Expand Fair Housing Outreach and Education**

Issues: 5.3 Lack of Fair Housing Knowledge, 5.5 State and Local Barriers

Metrics and Milestones:

- Distribute the Fair Housing Equity Plan to stakeholders strategically and broadly
- Partner with Montana Fair Housing to distribute and, if needed, collaborate to develop educational materials about fair housing rights and resources
- Share the Fair Housing Equity Plan with stakeholders, including advocates and legislators, during the 2025 Legislative Session




2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Fair Housing Goals

Goal 2: **Increase Fair Housing Coordination**



Issues: 1.1: Disproportionately Less Access to Mortgages for American Indian Applicants, 1.2: Disproportionately Higher Rates of Poverty for American Indians, 1.3: Lower Levels of Access to Community Assets for American Indians, 1.4: R/ECAPs Occur in Communities with American Indian Poverty, 2.1: Higher Rates of Cost Burden for Low-Income Households, 3.1: Renter Households Face Higher Rates of Cost Burdens Statewide, 4.1: Senior Households and Households with Disabilities Face Increased Levels of Housing Need Statewide, 5.1: Lack of Resources, 5.4: Institutional Barriers, 5.5: State and Local Barriers

Metrics and Milestones:

- Convene an interagency work group to assess equity needs and opportunities across the state; examine poverty strategy and identify underutilized or new resources for housing and community development



2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Fair Housing Goals

Goal 3:

Reduce Barriers for Native American Households and Communities



Issues: 1.1: Disproportionately Less Access to Mortgages for American Indian Applicants, 1.4: R/ECAPs Occur in Communities with American Indian Poverty, 5.2 Lack of Federal-Level Data

Metrics and Milestones:

- Continue to partner with NeighborWorks Montana to support homebuyer education
- Continue to participate in the Montana Native Homeownership Coalition
- Provide targeted technical assistance to service providers and developers in R/ECAPs
- Continue to call attention to existing information gaps at the federal level and continue to engage with federal partners to share new resources as they become available



2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Fair Housing Goals

Goal 4:

Support Housing and Community Development for Priority Areas and Populations

Issues: 1.3: Lower Levels of Access to Community Assets for American Indians, 1.4: R/ECAPs Occur in Communities with American Indian Poverty, 4.1: Senior Households and Households with Disabilities Face Increased Levels of Housing Need Statewide

Metrics and Milestones:

- Prioritize funding for housing and community development that benefits disproportionately impacted or otherwise underserved populations and serves areas that are under-resourced or have high rates of poverty



2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Fair Housing Goals

Goal 5:

Build the Capacity of Partners and Developers of Housing and Community Assets



Issues: 5.1: Lack of Resources, 5.4 Institutional Barriers, 5.5: State and Local Barriers

Metrics and Milestones:

- Create toolkits in support of housing and community development projects
- Continue to provide support broadly via the Community Technical Assistance Program



2025-2029 Consolidated Plan

Equity Plan Development (cont'd)

Fair Housing Goals

Goal 6:

Carryout Governor's Housing Task Force Recommendations

Issues: 5.5: State and Local Barriers

Metrics and Milestones:

- Continue to engage with the Governor's Housing Task Force and assist to carryout recommendations to increase the supply of affordable and attainable housing for Montanans



2025-2029 Consolidated Plan

Equity Plan Adoption and Evaluation

- Once finalized, the Equity Plan will be submitted to HUD. **Upon receipt, HUD will publish the plan and make it available for a 60-day public review period.**
- After HUD accepts Montana's Equity Plan, it will be published on Commerce's website, and its fair housing goals and strategies will be incorporated into the State's 2025-2029 Consolidated Plan and associated Annual Action Plans.
- **Progress evaluations for the Equity Plan will be required annually after the Equity Plan is adopted.**
 - Before submitting its Annual Progress Evaluations for the Equity Plan to HUD, the State will make available to interested parties the proposed evaluation for a comment period of no less than 15 calendar days.



2025-2029 Consolidated Plan

Document Review, Engagement

- Once drafted, Equity Plan and Consolidated Plan documents will be available:
 - On Commerce's website at commerce.mt.gov/Consolidated-Plan
 - Several repositories throughout the state (see website for list)
 - By request
- All interested parties are encouraged to review published documents and to participate in the State's public meetings. For information about upcoming meetings and comment periods, visit commerce.mt.gov/Consolidated-Plan/Updates and/or subscribe to Commerce's Consolidated Plan email listserv.



2025-2029 Consolidated and Equity Plan

Commerce Contact Information

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Montana Relay 711:

<https://dphhs.mt.gov/detd/mtap/traditionalrelayservice>



2025-2029 Consolidated and Equity Plan

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Montana Relay 711:

<https://dphhs.mt.gov/detd/mtap/traditionalrelayservice>



2024 Equity Plan

We Need Your Feedback!

Comments regarding the 2024 Equity Plan for affirmatively furthering fair housing are now being accepted.

If you have a comment and are joining via webinar, please raise your hand so we can unmute you. If you are joining via phone, please press *9 to indicate you have a comment and then press *6 to unmute/re-mute yourself.

When providing comment

- Please state and spell your name
- Please state the organization you represent (if applicable)

Written comments should be sent to the address or email below and will be accepted until 5 p.m. MST on **Sept. 20, 2024**.

Montana Department of Commerce
Community MT Division
Attn: Con Plan
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Helena, MT 59620-0523
docconplan@mt.gov

thank you!

