



2025-2026 Consolidated Annual Performance Evaluation Report

**Montana Departments of Commerce
and Public Health and Human
Services**

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Introduction

The Montana Departments of Commerce and Public Health and Human Services receive annual U.S. Department of Housing and Urban Development funding for the following community planning and development programs: Community Development Block Grant, HOME Investment Partnerships Program, Emergency Solutions Grant and National Housing Trust Fund. In addition, Commerce has received one-time-only allocations for the CDBG-CARES Act and HOME-American Rescue Plan Act programs. Funding through these programs is crucial to organizations that struggle to obtain scarce funding to serve households at or below 80% of area median income.

As demonstrated in this 2025-2026 Consolidated Annual Performance and Evaluation Report, these programs have provided critical funding sources for constructing senior and health facilities in rural areas; developing housing facilities to assist disadvantaged populations; supporting economic opportunities for low- and moderate-income beneficiaries; and providing clean water and sanitary sewer to support the growth of vital, resilient communities across Montana.

Montana's CAPER reports to HUD the outcomes of activities completed with the resources made available to the state through CDBG, HOME, ESG and HTF programs during plan Year 1 — April 1, 2025-March 31, 2026 — which falls under the 2025-2029 Montana Consolidated Plan for Housing and Community Development and the 2025-2026 Annual Action Plan. CDBG-CV and HOME-ARP funds were not made available to the state during this program year, but during the 2020 and 2021 program years, respectively.

The Consolidated Plan and AAP fulfill three basic goals in Montana: Provide decent housing, provide a suitable living environment and expand economic opportunities. The 2025-2026 AAP outlines the actions Montana proposed to take during Plan Year 1 to support these basic goals and the strategic goals identified in the 2025-2029 Consolidated Plan. The CAPER identifies the accomplishments of the CDBG, CDBG-

CV, ESG, HOME, HOME-ARP and HTF programs and compares them with the goals and objectives put forth in the Consolidated Plan and AAP.

Much of the information relevant to the 2025-2029 Consolidated Plan is reported in HUD's Integrated Disbursement and Information System, which interfaces with HUD's eCon Planning Suite. IDIS and the eCon Planning Suite establish the format and manner in which data is collected and reported in all Consolidated Plan documents. Montana augments some of HUD's data, when necessary, to report additional program accomplishments or provide detail not available in IDIS. The 2025-2026 CAPER is the first CAPER provided for the 2025-2029 Consolidated Plan and is in the eCon Planning Suite format prescribed by HUD.

Montana's CAPER references various IDIS reports, which the state uses to report accomplishments and progress made towards meeting established goals. These reports, which summarize project-level data for each program, including the annual CDBG Performance Evaluation Reports, are available on [Commerce's Consolidated Plan Documents page](#) and will be provided to the public and other stakeholders upon request.

CR-05 — Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The 2025-2029 Consolidated Plan and 2025-2026 AAP established five goals for the CDBG, HOME, HTF and ESG programs:

- Preserve and construct affordable housing
- Plan for communities
- Improve and sustain vital public infrastructure

- Revitalize local economies
- Reduce homelessness

The planned funding allocations for the 2025-2026 AAP included funding allocations for each of these goals from CDBG, HOME, ESG and HTF:

- Goal 1 — preserve and construct affordable housing — is supported by \$1,000,000 in CDBG; \$2,764,372.26 in HOME; and \$2,384,372.26 in HTF funding.
- Goal 2 — plan for communities — is supported by \$600,000 in CDBG funding.
- Goal 3 — improve and sustain vital infrastructure — is supported by \$3,096,840 in CDBG funding.
- Goal 4 — revitalize local economies — is supported by \$1,000,000 in CDBG funding.
- Goal 5 — reduced homelessness — is supported by \$500,000 in CDBG; \$750,000 in HOME; \$743,684 in ESG; and \$750,000 in HTF funding.

Administration costs are also estimated to be 4% of CDBG funding, 10% of HOME funding, 8% of ESG funding and 10% of HTF funding.

Awards for the 2025-2026 program year contribute to supporting these goals. For the 2025-2026 program year, awards that support the goal to preserve and construct affordable housing included \$3,396,384 in CDBG funding; \$2,713,000 in HOME funding; and \$2,821,000 in HTF funding. Awards that support the goal to plan for communities included \$608,963 in CDBG funding. Awards that support the goal to improve and sustain vital public infrastructure included \$3,484,612 in CDBG funding. Awards that support the goal to revitalize local economies included \$525,000 in CDBG funding. Awards that support the goal to reduce homelessness included \$744,418 in ESG funding.

Projects are generally funded in one plan year and have expenditures recorded in a subsequent plan year, because construction activities typically begin 12 to 15 months

after award; and once construction commences, grant expenditures may not occur immediately.

Expenditures for Plan Year 1 for CDBG, HOME, HTF and ESG totaled \$13,181,860.96. Expenditures for Plan Year 1 for one-time grants, CDBG-CV and HOME-ARP, were \$4,123,960.50 for HOME-ARP and \$1,345,035.82 for CDBG-CV. The first goal, preserve and construct affordable housing, expended \$2,220,884.26 in CDBG; \$161,652.12 in CDBG-CV; \$1,254,189.44 in HOME; and \$2,680,422.72 in HTF, totaling \$6,317,148.54 in resources to assist eligible households across the state through development and rehabilitation of rental properties and owner-occupied homes, as well as down payment assistance. The second goal, plan for communities, expended \$587,569.56 in CDBG resources to support local governments with long-range planning activities to address various community wide and site-specific needs across the state. The third goal, improve and sustain public infrastructure, expended \$4,616,768.46 in CDBG and \$195,434.74 in CDBG-CV resources to assist eligible Montana communities with new or improved access to vital public infrastructure and community facilities. The fourth goal, revitalize local economies, expended \$352,569.07 in CDBG resources to create or retain jobs and benefit eligible businesses. The final goal, reduce homelessness, expended \$924,411.76 in CDBG-CV; \$3,999,219.34 in HOME-ARP; \$15,414.67 in HOME; \$28,000 in HTF; and \$744,418 in ESG resources. In addition, administration costs were \$134,997.67 for CDBG; \$63,537.20 for CDBG-CV; \$251,508.81 for HOME; and \$294,118.30 for HTF.

ESG assisted 1,976 individuals, spending \$288,448.33 to serve 229 individuals through homeless prevention activities and \$331,029.33 to serve 332 individuals through rapid rehousing activities including case management, rental assistance, rental arrears, security deposit payments and other housing relocation and stabilization services. ESG subrecipients spent \$65,109.98 to assist shelters, and serving 1,415 individuals through operations support. ESG subrecipients have set up their coordinated entry systems and are using ESG in combination with other funds to cover expenses. The state spent \$5,109.24 for access to HMIS for state staff and ESG subrecipients.

In addition to expending program funds in support of existing projects, Commerce awarded program funds to several new projects.

The state received 44 applications for the 2025 CDBG application cycle, and CDBG funding was awarded to 27 projects. The state received six applications for the 2025 HOME application cycle, and HOME funding was awarded to three projects in November and December 2025. The state received five applications for the 2025 HTF application cycle, two of which received HTF awards.

Applicants often use CDBG, HOME and HTF funds in combination with other federal, state and local funds. Proposed projects align with community needs and address priorities identified in long-range plans. Commerce does not dictate which applicants apply or which projects are proposed; all applications are considered and ranked, and eligible projects are awarded funding based on their ranking score and funding availability.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g) Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs and percentage completed for each of the grantee's program year goals.

Commerce does not prescribe the location or type of CDBG, HOME and HTF projects that applicants submit; therefore, some goals may not be addressed in a specific plan year if applications are lacking or if proposed projects are not ultimately funded. Additionally, CDBG, HOME and HTF projects generally take two to four years to complete; thus, expenditures for these programs may be reported in one plan year while associated accomplishments are reported in another. Because applications to be received and rankings to be determined are unknown, and because project completion dates are often difficult to predict, Commerce anticipates outcomes based on historical

data. Due to these challenges, proposed outcomes may not align with actual outcomes. Table 1 shows both current and cumulative accomplishment data for the 2025-2029 Consolidated Plan period.

For the first goal, to preserve and construct affordable housing, Commerce achieved 27% of its one-year goal and 7% of its five-year goal to construct units each year. In addition, it achieved 153% of its one-year goal and 26% of its five-year goal to rehabilitate 15 rental units annually. No homeowner housing units were added this year, but one was rehabilitated in this program year, accounting for 33% of the annual goal and 7% of the five-year goal. Twenty households were provided with first-time homebuyer assistance, reaching 200% of the one-year goal and 20% of the five-year goal. In the goal to plan for communities, 28 plans were completed in the 2025-2026 program year, achieving 140% of the annual goal and 47% of the five-year goal. The goal to improve and sustain public infrastructure saw progress, with the number of people assisted surpassing the one- and five-year goals, at 20,598 low-to moderate-income people assisted with public or infrastructure facility improvements. The goal to revitalize local economies saw progress with the number of jobs created or retained, achieving 17, which is 34% of the one-year goal of 30 jobs. The goal to reduce homelessness saw the completion of 11 units added for the homeless, meeting 55% of the one-year goal and 12% of the five-year goal, as well as 75% of the one-year goal to provide rapid rehousing, and 57% of the one-year goal for homelessness prevention activities.

Table 1 — Accomplishments — Program Year and Strategic Plan to Date

Goal 1: Preserve and construct affordable housing								
Category: Affordable Housing								
Source and amount for all program years								
	CDBG	\$1,000,000.00						
	HOME	\$2,764,372.26						
	HTF	\$3,384,373.20						
Source and amount for all current year								
	CDBG	\$1,000,000.00						
	HOME	\$2,764,372.26						
	HTF	\$3,384,373.20						
			5-year expected	5-year actual	Percent complete	Current year expected	Current year actual	Percent complete
Indicator:	Rental units constructed		60	4	7%	15	4	27%
	Rental units rehabilitated		90	23	26%	15	23	153%
	Homeowner housing added		10	0	0%	2	0	0%
	Homeowner housing rehabilitated		15	1	7%	3	1	33%
	Direct financial assistance to homebuyers		100	20	20%	10	20	200%
Unit of measure:	Household housing unit or households assisted							

Goal 2: Plan for communities								
Category: Non-housing community development								
Source and amount for all program years								
	CDBG	\$600,000.00						
Source and amount for all current year								
	CDBG	\$600,000.00						
			5-year expected	5-year actual	Percent complete	Current year expected	Current year actual	Percent complete
Indicator:	Other		60	28	47%	20	28	140%
Unit of measure:	Local governments assisted							


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Goal 3: Improve and sustain public infrastructure								
Category: non-housing community development								
Source and amount for all program years								
		CDBG	\$3,096,840.00					
Source and amount for all current year								
		CDBG	\$3,096,840.00					
			5-year expected	5-year actual	Percent complete	Current year expected	Current year actual	Percent complete
Indicator:	Public facility or infrastructure activities non-housing		5,000	20,598	412%	1,000	20,598	2060%
Unit of measure:	Persons assisted							
Indicator:	Public facility or infrastructure activities housing		100	0	0%	20	0	0%
Unit of measure:	Persons assisted							

Goal 4: Revitalize local economies								
Category: non-housing community development								
Source and amount for all program years								
		CDBG	\$1,000,000.00					
Source and amount for all current year								
		CDBG	\$1,000,000.00					
			5-year expected	5-year actual	Percent complete	Current year expected	Current year actual	Percent complete
Indicator:	Façade treatment or business building rehabilitation		5	0	0%	1	0	0%
Unit of measure:	Businesses assisted							
Indicator:	Jobs created or retained		150	17	11%	30	17	57%
Unit of measure:	Jobs							
Indicator:	Businesses assisted		10	0	0%	2	0	0%
Unit of measure:	Businesses							


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Goal 5: Reduce homelessness										
Category: Homeless										
Source and amount for all program years										
	CDBG	\$500,000.00	HOME	\$750,000.00						
	HTF	\$750,000.00	ESG	\$743,684.00						
Source and amount for all current year										
	CDBG	\$500,000.00	HOME	\$750,000.00						
	HTF	\$750,000.00	ESG	\$743,684.00						
					5-year expected	5-year actual	Percent complete	Current year expected	Current year actual	Percent complete
Indicator:	Tenant-based rental assistance and rapid rehousing				2,000	244	12%	325	244	0%
Unit of measure:	Households assisted									
Indicator:	Homeless person overnight shelter				100	1,415	142%	20	1,415	708%
Unit of measure:	Persons assisted									
Indicator:	Homelessness prevention				2,500	229	9%	405	229	57%
Unit of measure:	Persons assisted									
Indicator:	Housing for homeless added				50	11	22%	20	11	55%
Unit of measure:	Household housing unit									

Source: IDIS Report PR23 — CDBG Summary of Accomplishments; IDIS Report PR23 — HOME Summary of Accomplishments; DPHHS; 2025-2026 AAP

See IDIS Report PR23 — CDBG-CV Summary of Accomplishments for a detailed accounting of CDBG-CV accomplishments across goal categories.

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Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

As stated above, the 2025-2026 AAP identified the following five goals:

- Preserve and construct affordable housing
- Plan for communities
- Improve and sustain vital public infrastructure
- Revitalize local economies
- Reduce homelessness

As reflected in Table CR-1, the CDBG, HOME and HTF programs funded and initiated projects throughout the state during Plan Year 1. These projects will assist communities with local efforts to preserve and construct affordable housing, plan for communities, improve and sustain public infrastructure, revitalize local economies and reduce homelessness. Upon completion, all activities supported by program funds will benefit income-eligible households. There were five awards for CDBG Public Facilities, sixteen awards for CDBG Planning, one award for CDBG Economic Development and five awards for CDBG Housing. In addition, there were three HOME and two HTF housing awards.

Table CR-1 includes the CDBG activities reported in the Timely Distribution Report, which is submitted to HUD annually.

Table CR-1 — Projects Awarded During Plan Year 1

Program	Applicant	County	Funds Awarded	Goal	Project Description
CDBG Public Facilities	City of Roundup	Musselshell	\$750,000	Improve and sustain vital public infrastructure	Wastewater system improvements
CDBG Public Facilities	Town of Darby	Ravalli	\$734,612	Improve and sustain vital public infrastructure	Installation of UV disinfection to address E.coli violations
CDBG Community Facilities	Town of Richey	Dawson	\$500,000	Improve and sustain vital public infrastructure	Municipal water system improvements
CDBG Public Facilities	Town of Ennis	Madison	\$750,000	Improve and sustain vital public infrastructure	Water system improvements
CDBG Community Facilities	Town of Philipsburg	Granite	\$750,000	Improve and sustain vital public infrastructure	Water transmission line upgrade


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Program	Applicant	County	Funds Awarded	Goal	Project Description
CDBG Planning	Lewis and Clark County	Lewis and Clark	\$50,000	Planning for communities	PAR for Lincoln Public Safety and Emergency Operations Center
CDBG Planning	Custer County	Custer	\$23,250	Planning for communities	PAR for Miles City Public Library
CDBG Planning	City of Plentywood	Sheridan	\$45,000	Planning for communities	Growth policy
CDBG Planning	Missoula County	Missoula	\$26,250	Planning for communities	PAR for Seeley Lake Elementary School
CDBG Planning	Wibaux County	Wibaux	\$30,000	Planning for communities	Growth policy/CIP
CDBG Planning	City of Fort Benton	Chouteau	\$32,000	Planning for communities	Zoning code
CDBG Planning	Powell County	Powell	\$50,000	Planning for communities	Growth policy update
CDBG Planning	City of Havre	Hill	\$50,000	Planning for communities	Stormwater PER


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Program	Applicant	County	Funds Awarded	Goal	Project Description
CDBG Planning	City of Helena	Lewis and Clark	\$50,000	Planning for communities	PAR, feasibility study and CIP for Ability Montana
CDBG Planning	Town of Bainville	Roosevelt	\$50,000	Planning for communities	Growth policy update
CDBG Planning	Blaine County	Blaine	\$30,000	Planning for communities	Growth policy
CDBG Planning	Chouteau County	Chouteau	\$18,750	Planning for communities	Growth policy update
CDBG Planning	Lincoln County	Lincoln	\$47,713	Planning for communities	PAR for Lincoln County Animal Shelter
CDBG Planning	McCone County	McCone	\$40,000	Planning for communities	Zoning regulations
CDBG Planning	City of Glasgow	Valley	\$35,000	Planning for communities	Growth policy update and downtown revitalization plan update


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Program	Applicant	County	Funds Awarded	Goal	Project Description
CDBG Planning	City of Wolf Point	Roosevelt	\$28,000	Planning for communities	Solid waste system PER
CDBG Housing	Fergus County	Fergus	\$1,815,204	Preserve and construct affordable housing	New construction of group home for adults with disabilities for Heart of Montana Farm in the Dell
CDBG Housing	Twin Bridges	Madison	\$400,000	Preserve and construct affordable housing	New construction of a fourplex to serve LMI households
CDBG Housing	Mineral County, Ravalli County and Missoula County	Mineral, Ravalli and Missoula	\$1,181,180	Preserve and construct affordable housing	Rehabilitation of single-family homes for homeowners to address health, safety and accessibility issues
CDBG Economic Development	Missoula County	Missoula	\$525,000	Revitalizing local economies	Roof replacement for the Missoula Children's Theatre


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Program	Applicant	County	Funds Awarded	Goal	Project Description
HOME	CR Builders	Custer	\$863,000	Preserve and construct affordable housing	New construction of 30 affordable apartments in Miles City
HOME	Crow Tribe	Big Horn	\$1,500,000	Preserve and construct affordable housing	Rehabilitation of motel to provide permanent supportive housing to households experiencing homelessness in Big Horn County
HOME	Trust Montana	Statewide	\$350,000	Preserve and construct affordable housing	Down payment and closing cost assistance to income-eligible homebuyers of community land trust homes
HTF	CR Builders	Custer	\$1,150,000	Preserve and construct affordable housing	New construction of 30 affordable apartments in Miles City

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Program	Applicant	County	Funds Awarded	Goal	Project Description
HTF	Homeward, Inc.	Yellowstone	\$1,671,000	Preserve and construct affordable housing	Rehabilitation of the Sage Tower in Billings

Source: Commerce's grants database (commerce.mt.gov/about/funded-projects)

CR-10 — Racial and Ethnic Composition of Families Assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

Data presented in Table 2 are for the projects completed during Plan Year 1 and are not cumulative for the 2025-2029 Consolidated Plan.

Table 2 — Table of Assistance to Racial and Ethnic Populations by Sources of Funds

	CDBG	CDBG- CV	HOME	ESG	HTF	Total
White	48,807	967	101	1,269	2	51,146
Black/African American	377	130	0	77	0	584
Asian	538	13	0	16	0	567
American Indian/Alaskan Native	2,366	260	0	301	6	2,933
Native Hawaiian or Other Pacific Islander	22	5	0	8	0	35
American Indian/Alaskan Native and White	894	8	1	60	1	964
Asian and White	246	0	0	2	0	248


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	CDBG	CDBG-CV	HOME	ESG	HTF	Total
Black/African American and White	263	0	0	14	0	277
American Indian/Alaskan Native and Black/African American	0	0	0	8	0	8
Other	1,500	0	0	213	0	1,713
Not Identified	0	0	0	8	0	8
Total	55,013	1,383	102	1,976	9	58,483
Hispanic	1,544	106	27	80	1	1,758
Not Hispanic	53,469	1,277	75	1,881	8	56,710
Not Identified	0	0	0	26	0	26

Source: IDIS Report PR23 — CDBG Summary of Accomplishments; IDIS Report PR23 — CDBG-CV Summary of Accomplishments; IDIS Report PR23 — HOME Summary of Accomplishments; 2025 Completed IDIS Activities for HTF

Narrative

The CDBG, CDBG-CV, HOME, HTF and ESG programs assisted persons from various racial and ethnic backgrounds during Plan Year 1. In total, 51,146 assisted individuals identified as White, 584 identified as Black or African American, 567 identified as Asian, 2,933 identified as American Indian or American Native and 35 identified as Native Hawaiian or Other Pacific Islander. Of the assisted individuals, 56,710 identified their ethnic background as Not Hispanic, 1,758 identified as Hispanic and 26 did not identify.

Because the state’s HOPWA funds are provided via competitive award and not through a formula grant, HOPWA data is not included in Table 2. HOPWA data for competitive awards is presented in a separate report: the HOPWA Annual Progress Report.

CR-15 — Resources and Investments 91.520(a)

Identify the resources made available.

Table 3 reflects resources made available and expenditures by program during Plan Year 1.

Table 3 — Resources Made Available

Sources of Funds	Source	Resources Made Available*	Amount Expended During Program Year
CDBG	Public/federal	\$6,196,840.00	\$7,912,789.02
CDBG-CV**	Public/federal	\$0.00	\$1,345,035.82
HOME	Public/federal	\$3,514,372.26	\$1,522,112.92
HOME-ARP**	Public/federal	\$0.00	\$4,123,960.50
ESG	Public/federal	\$743,684.00	\$744,418.00
HTF	Public/federal	\$3,134,373.20	\$3,002,541.02

Source: IDIS Report PR28 — CDBG Financial Summary Report; PR23 — CDBG-CV Summary of Accomplishments; IDIS Report PR07 — Drawdown Report by Voucher Number

* Amounts in this column reflect those presented in the 2025-2026 AAP.

** One-time-only funds made available in previous program years

Narrative

During the 2025-2026 program year, the CDBG Program received an allocation of \$6,196,840. During the 2025-2026 program year, \$7,912,789.02 of this resource, and

prior year resources, were expended. Utilizing resources made available, the CDBG Program awarded a total of \$4,795,247 to 27 projects as detailed in Table CR-1.

During the 2020-2021 program year, the CDBG-CV Program received an allocation of \$10,174,175, all of which was awarded during the 2021-2022 program year. During the 2025-2026 program year, \$1,345,035.82 in CDBG-CV funds were expended.

During the 2025-2026 program year, the HOME Program received an allocation of \$3,014,372.26 and estimated receiving \$500,000 in HOME Program income. During the 2025-2026 program year, \$1,522,112.92 of this resource was expended, \$848,181.61 of which was program income. Utilizing resources made available, the HOME Program awarded a total of \$2,713,000 to three projects as detailed in Table CR-1. All available HOME funds have been awarded to eligible projects.

During the 2021-2022 program year, the HOME-ARP Program received an allocation of \$11,308,920, \$7,159,501 of which was awarded during the 2023-2024 program year. The remaining \$3,185,000 was awarded during the 2024-2025 program year, and the remaining HOME-ARP funds are set aside for administration of the program. During the 2025-2026 program year, \$4,123,960.50 was expended.

During the 2025-2026 program year, the HTF Program received an allocation of \$3,134,373.20. During the 2025-2026 program year, \$3,002,541.02 of this resource was expended. Utilizing resources made available, the HTF Program awarded a total of \$2,821,000 to two projects as detailed in Table CR-1. All available HTF funds have been awarded to eligible projects.

During the 2025-2026 program year, the ESG Program received an allocation of \$743,684. This allocation was passed through to eight Human Resource Development Councils in Montana via formula grants. This program year saw expenditures of \$744,418 using all the FY24 allocation; therefore, the amount spent is slightly higher than the amount awarded for FY25.

Because the state’s HOPWA funds are provided via competitive award and not through a formula grant, HOPWA data is not included in Table 3. HOPWA data for competitive awards is presented in a separate report: the HOPWAAPR.

Identify the geographic distribution and location of investments.

The state does not have geographic priorities for any of its federally funded CPD programs. As described in the 2025-2029 Consolidated Plan and the 2025-2026 AAP, the State of Montana does not target any particular geographic area for special assistance but allows non-entitlement communities to apply for CDBG, all communities and developers to apply for HOME, and developers to apply for HTF funding. ESG funds are distributed via formula allocation to HRDCs throughout the state.

While there is no planned geographic distribution in the 2025-2029 Consolidated Plan or 2025-2026 AAP, Table CR-2 shows the amount of CDBG, HOME and HTF funds awarded and percent of total funding allocation by county for the 2025-2026 program year and the entire 2025-2029 Consolidated Plan period.

Table CR-2 — Project Geographic Distribution and Percentage of Allocation for CDBG, HOME and HTF

County	2025-2026 Funded Amount	2025-2026 % of Awards	2025-2029 Total Funded Amount	2025-2029 Total % of Awards
Anaconda-Deer Lodge	\$0	0.00%	\$0	0.00%
Beaverhead	\$0	0.00%	\$0	0.00%
Big Horn	\$1,500,000	10.70%	\$1,500,000	10.70%
Blaine	\$30,000	0.21%	\$30,000	0.21%
Broadwater	\$0	0.00%	\$0	0.00%
Butte-Silver Bow	\$0	0.00%	\$0	0.00%


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Carbon	\$0	0.00%	\$0	0.00%
Carter	\$0	0.00%	\$0	0.00%
Cascade	\$0	0.00%	\$0	0.00%
Chouteau	\$50,750	0.36%	\$50,750	0.36%
Custer	\$2,036,250	14.53%	\$2,036,250	14.53%
Daniels	\$0	0.00%	\$0	0.00%
Dawson	\$500,000	3.57%	\$500,000	3.57%
Fallon	\$0	0.00%	\$0	0.00%
Fergus	\$1,815,204	12.95%	\$1,815,204	12.95%
Flathead	\$0	0.00%	\$0	0.00%
Gallatin	\$0	0.00%	\$0	0.00%
Garfield	\$0	0.00%	\$0	0.00%
Glacier	\$0	0.00%	\$0	0.00%
Golden Valley	\$0	0.00%	\$0	0.00%
Granite	\$750,000	5.35%	\$750,000	5.35%
Hill	\$50,000	0.36%	\$50,000	0.36%
Jefferson	\$0	0.00%	\$0	0.00%
Judith Basin	\$0	0.00%	\$0	0.00%
Lake	\$0	0.00%	\$0	0.00%
Lewis and Clark	\$100,000	0.71%	\$100,000	0.71%
Liberty	\$0	0.00%	\$0	0.00%
Lincoln	\$47,713	0.34%	\$47,713	0.34%
Madison	\$1,150,000	8.21%	\$1,150,000	8.21%
McCone	\$40,000	0.29%	\$40,000	0.29%
Meagher	\$0	0.00%	\$0	0.00%
Mineral	\$750,000	5.35%	\$750,000	5.35%
Missoula	\$1,051,250	7.50%	\$1,051,250	7.50%
Musselshell	\$750,000	5.35%	\$750,000	5.35%
Park	\$0	0.00%	\$0	0.00%


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Petroleum	\$0	0.00%	\$0	0.00%
Phillips	\$0	0.00%	\$0	0.00%
Pondera	\$0	0.00%	\$0	0.00%
Powder River	\$0	0.00%	\$0	0.00%
Powell	\$50,000	0.36%	\$50,000	0.36%
Prairie	\$0	0.00%	\$0	0.00%
Ravalli	\$1,484,612	10.59%	\$1,484,612	10.59%
Richland	\$0	0.00%	\$0	0.00%
Roosevelt	\$78,000	0.56%	\$78,000	0.56%
Rosebud	\$0	0.00%	\$0	0.00%
Sanders	\$0	0.00%	\$0	0.00%
Sheridan	\$45,000	0.32%	\$45,000	0.32%
Stillwater	\$0	0.00%	\$0	0.00%
Sweet Grass	\$0	0.00%	\$0	0.00%
Teton	\$0	0.00%	\$0	0.00%
Toole	\$0	0.00%	\$0	0.00%
Treasure	\$0	0.00%	\$0	0.00%
Valley	\$35,000	0.25%	\$35,000	0.25%
Wheatland	\$0	0.00%	\$0	0.00%
Wibaux	\$30,000	0.21%	\$30,000	0.21%
Yellowstone	\$1,671,000	11.92%	\$1,671,000	11.92%
Total	\$14,014,779	100%	\$14,014,779	100%

Source: Commerce's Grants Database (commerce.mt.gov/about/funded-projects)

Narrative

As described in the 2025-2029 Consolidated Plan and the 2025-2026 AAP, the state does not target any particular geographic area for special assistance but allows non-entitlement communities to apply for CDBG, all communities and developers to apply for

HOME and developers to apply for HTF funding. ESG funds are distributed via formula allocation to HRDCs throughout the state.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Commerce programs leveraged CDBG, HOME and HTF resources with other federal, state and local funding to maximize the impact of HUD funding and utilize available funding resources to conduct housing and community development activities that will benefit income-eligible households. There was no state-owned land or property that was used to address the needs identified in this plan.

The CDBG Program requires 100% match for economic development projects that benefit a for-profit entity and a 25% match for a nonprofit entity. There is a 25% match for public facilities projects. For other CDBG projects, match is encouraged but not required; however, applicants' relative ability to leverage private, local, state or federal funds is considered when ranking other CDBG projects. The maximum amount of CDBG funds that can be awarded to an individual community or public facilities project is \$750,000. There is a \$525,000 award ceiling for economic development activities and \$50,000 for planning activities. Similar to HOME and HTF, the maximum CDBG Housing award depends on the specific financials for the proposed project as presented in the application. These caps make leveraging an important component of any CDBG-funded project.

CDBG Economic Development match contributions can come from a variety of sources, including cash investment, bank loans, state or federal loan programs or grants. Most

economic development grants are at least partially matched with funds from state grants, private bank loans or owner equity.

CDBG Public Facilities match contributions are typically provided by a direct cash contribution or by incurring a loan through bond financing, which is paid through user charges or property tax assessments. Other local match sources include loan or grant funds from other competitive state grant programs, funds expended for predevelopment planning, the value of donated 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 and satisfies the waiver request requirements.

Commerce's HOME Program requires 5% match for both multifamily and single-family projects. This match requirement may be fully or partially waived if the subrecipient demonstrates financial hardship or shows that extenuating circumstances justify an exemption. HOME matching contributions must come from non-federal sources and are typically obtained through private grants; direct cash contributions; donated materials and labor; donated land or real property; foregone interest, taxes or fees; and proceeds from bond financing. The HTF, CDBG-CV and HOME-ARP programs do not require match.

ESG funds are matched by subrecipients who provide rental assistance and/or supportive services through their housing programs and the Montana Continuum of Care Program. A significant amount of local ESG subrecipients contribute additional resources such as block grant funds, local public funds and local philanthropic foundation resources to the homeless programs they operate. ESG grant funds are required to be matched 100% after the first \$100,000 of the fiscal year grant. The state recipient must transfer the benefit of this exception to its subrecipients that are least capable of providing the recipient with matching contributions. See 24 CFR Section 576.201, which outlines matching requirements, for further details. ESG match amounts are reported in the SAGE data system. An attachment of the report is included.

Commerce’s internal tracking processes are used to record and report all matching funds from CDBG and HOME projects. Grantees submit invoices and correlate funding sources to specific expenditures. Commerce staff documents eligible matching funds with each drawdown and tracks the cumulative tally throughout the project. Table 5 indicates the excess matching funds the HOME Program carried over from previous federal fiscal years, matching funds contributed during the current federal fiscal year, the total of all matching funds available for the current federal fiscal year, the amount of match liability for the current federal fiscal year and the excess match that will be carried over to the next federal fiscal year. The match reported in this CAPER falls within the federal fiscal year beginning Oct. 1, 2024, and ending Sept. 30, 2025. In addition to this CAPER, Commerce provides match reporting via HUD form HUD-40107-A.

Table 4 — Fiscal Year Summary — HOME Match Report

Excess match from prior federal fiscal year	\$21,394,869.04
Match contributed during current federal fiscal year	\$1,808,854.93
Total match available for current federal fiscal year (Line 1 plus Line 2)	\$23,203,723.97
Match liability for current federal fiscal year	\$1,164,693.14
Excess match carried over to next federal fiscal year (Line 3 minus Line 4)	\$22,039,030.83

Source: IDIS Report PR33 — HOME Matching Liability; Commerce comprehensive tracking spreadsheets

HOME matching fund contributions are recorded between Oct. 1, 2024, and Sept. 30, 2025, per HUD requirements. These funds are contributed as part of the HOME Program, which supports housing development and rehabilitation activities and provides down payment assistance to homebuyers. The excess match from the prior fiscal year was \$21,394,869.04. An additional \$1,808,854.93 match was contributed during the current federal fiscal year, totaling \$23,203,723.97 available for the current federal fiscal year. The current match liability, according to IDIS Report PR-33, is \$1,164,693.14,

leaving an excess match of \$22,039,030.83 to be carried over to the next federal fiscal year. There were match contributions made for 26 projects during this time period, totaling \$1,808,854.93. Of this total, \$846,931.18 came from non-federal cash; \$189,997 came from appraised land or real property; \$40,000 came from site preparation, construction materials and donated labor; and \$731,926.75 came from bond financing.

Program Income

HOME began the program year with no program income and received and expended \$848,181.61 in program income during the program year. The HOME Program does not award or expend funding for Tenant Based Rental Assistance activities.

HOME MBE/WBE Report

Commerce collects and records disadvantaged business enterprise, minority business enterprise and women-owned business enterprise information throughout the program year and reports it to HUD for the federal fiscal year in the Contract and Subcontract Activity Report. There were 43 contracts in the program year, and 41 of them were held by White non-Hispanic contractors, totaling \$21,444,365.39. The other two contracts were awarded to a Black non-Hispanic contractor and a Hispanic contractor. These two contracts totaled \$3,558 and \$228,408, respectively. Of the 43 prime contractors, none were women-owned businesses. There were 52 subcontracts in this time period, totaling \$8,540,798.79. All but three of these subcontracts were held by White non-Hispanics, totaling \$8,133,138.79. The three other subcontracts were held by Hispanic subcontractors and totaled \$407,660. Of the 52 subcontracts, three were women-owned and accounted for \$103,000. No minority owners of rental properties were reported.

Table 5 — Minority Business and Women Business Enterprises

Minority Business Enterprises and Women Business Enterprises — Indicate the number and dollar value of contracts for HOME projects completed during the reporting period.						
	Total	Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	White Non-Hispanic
Number of Contracts	43	0	0	1	1	41
Dollar Amounts	\$21,444,365.39	\$0.00	\$0.00	\$3,558.00	\$228,408.00	\$21,212,399.39
Number of Subcontracts	9	0	0	0	0	9
Dollar Amounts	\$8,540,798.79	\$0.00	\$0.00	\$0.00	\$407,660.00	\$8,133,138.79

	Total	Women Business Enterprises	Male Business Enterprises
Number of Contracts	43	0	43
Dollar Amounts	\$21,444,365.39	\$0.00	\$21,444,365.39
Number of Subcontracts	9	3	6
Dollar Amounts	\$8,540,798.79	\$103,000.00	\$8,437,798.79

Source: Form HUD-2516 for Periods April 1, 2025-Sept. 30, 2025 and Oct. 1, 2025 - March 31, 2026

Table 6 — Minority Owners of Rental Property

Minority owners of rental property — Indicate the number of HOME-assisted rental property owners and the total amount of HOME funds in these rental properties assisted.						
	Total	Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	White Non-Hispanic
Number	0	0	0	0	0	0
Dollar Amounts	\$0	\$0	\$0	\$0	\$0	\$0

During Plan Year 1, no parcels were acquired, no businesses were displaced, no nonprofit organizations were displaced and no households were displaced during the program year. Households were temporarily relocated within and from rental properties during rehabilitation; all were provided general information notices and assisted with moving belongings, and none were permanently displaced.

CR-20 — Affordable Housing 91.520(b)

Evaluation of the jurisdiction’s progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income and middle-income persons served.

Table 7 — Number of Households Served

Type of Households Served	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	345	255
Number of non-homeless households to be provided affordable housing units	260	151
Number of special-needs households to be provided affordable housing units	10	12
Total	615	418

Source: IDIS Report PR23 — CDBG Summary of Accomplishments; IDIS Report R23 — HOME Summary of Accomplishments; IDIS report PR103 — HTF Program and Beneficiary Characteristics for Completed Units; PR104 — HTF High Priority Performance Goals; IDIS Project Level Data

The one-year goal for Montana was to provide 345 homeless households with affordable housing units. In the 2025-2026 program year, 255 households were provided housing. The goal for non-homeless households was to provide affordable housing units to 260 households, and 151 were provided. The goal for special needs households was to

provide affordable housing units to 10 households, and 12 were provided. Another way to break down the number of affordable housing units developed in the planning year is by type. The goal for the number of households to support through rental assistance was 550, and 370 households received assistance this year. The goal for the number of households supported through the production of new units was twenty-seven, and four were provided. The goal for the number of households supported through rehab of existing units was 28, and 24 households were supported. The goal for the number of households supported through the acquisition of existing units was 10, and 20 were provided.

Table 8 — Number of Households Supported

Number of Households Served	One-Year Goal	Actual
Number of households supported through rental assistance	550	370
Number of households supported through the production of new units	27	4
Number of households supported through rehab of existing units	28	24
Number of households supported through acquisition of existing units	10	20
Total	615	418

Source: IDIS Report PR23 — CDBG Summary of Accomplishments; IDIS Report R23 — HOME Summary of Accomplishments; IDIS report PR103 — HTF Program and Beneficiary Characteristics for Completed Units; PR104 — HTF High Priority Performance Goals; IDIS Project Level Data

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The state made progress towards reaching the goals and objectives identified in the 2025-2029 Consolidated Plan and 2025-2026 AAP. During Plan Year 1, Commerce

awarded CDBG, HOME and HTF funds to activities that addressed goals 1 and 5 to preserve and construct affordable housing and to reduce homelessness. DPHHS used ESG funds to provide rental assistance to address Goal 5. DPHHS provided rental assistance to more households for rental housing than planned. Commerce exceeded its goals for the number of special needs households assisted by projects completed during Plan Year 1, assisting 12 households versus the 10 planned for. Commerce was below its goal for the rehabilitation of existing units, completing 24 units with 28 units planned. Commerce fell short of its goal for production of new units, with four units completed and a goal of twenty-seven. HOME-funded activities provided critical affordable housing development, with construction and rehabilitation of fifteen HOME-assisted units in three rental properties and exceeded the goal to provide downpayment and closing cost assistance to twenty households. HTF-funded activities provided critical affordable housing development to twelve households through rehabilitation, including one senior project. CDBG Housing funds provided rehabilitation for one homeowner household. Not included in Tables 7 and 8 is the first completed HOME-ARP project, which provided rental rehabilitation for eight households. ESG-funded activities provided assistance to 1,976 individuals in 1,486 households through all of its activities, as detailed in CR-25. Of that number assisted, ESG rental assistance was provided to 224 households experiencing homelessness, and 126 households, or 229 individuals, assisted with homeless prevention. An additional 1,415 individuals were served through shelter operation support.

For this program year with ESG, subrecipients utilized FY24 funds to assist as many participants as possible. With the ending of ESG-CV and Montana's Emergency Rental Assistance funds provided for in the American Rescue Plan Act, there was a rise in need. CDBG-CV funds were directed towards two single-unit residential rehabilitations but were not yet complete at the end of plan Year 1.

During Plan Year 1, one completed HTF project serves seniors and extremely low-income households. Another completed project financed with both HOME and HTF provides housing for those experiencing homelessness. Two additional HOME projects

were completed during Plan Year 1 and include rehabilitation of eight units serving adults with disabilities and new construction of four HOME-assisted units for seniors.

[Discuss how these outcomes will impact future annual action plans.](#)

Commerce and DPHHS will continue to improve grant processes to successfully report the accomplishments of the CDBG, CDBG-CV, HOME, HOME-ARP, ESG and HTF programs and measure progress made towards reaching long- and short-term goals and objectives. The one-year goals for our regular HUD CPD programs — CDBG, HOME and HTF — were developed under our 2025-2029 Consolidated Plan and related annual action plans for each program year. Commerce has seen success in recent years in reaching many of its housing goals and has numerous projects in various stages of completion. Rental unit rehabilitation and first-time homebuyer assistance exceeded their one-year goals. While new unit construction did not keep pace with the one-year goals, significant progress has been made, and Commerce expects to reach these goals with current and future projects. In light of these successes, Commerce intends to continue to undertake project selection and program management in a similar manner.

However, as a means of continuing to improve performance outcomes going forward, Commerce actively applies lessons learned and feedback from our awardees as we consider revisions to our grant administration manuals and processes and as we develop our next AAP.

[Include the number of extremely low-income, low-income and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.](#)

Table 9 — Number of Households Served

Number of Households Served	CDBG Actual — Housing	HOME Actual	HTF Actual
Extremely low-income	0	8	12
Low-income	0	12	N/A
Moderate-income	1	15	N/A
Total	1	35	12

Source: IDIS Report PR23 — CDBG Summary of Accomplishments; IDIS Report PR23 — HOME Summary of Accomplishments; IDIS report PR103 — HTF Program and Beneficiary Characteristics for Completed Units; PR104 — HTF High Priority Performance Goals; IDIS Project Level Data

Narrative Information

CPD resources are used to address the needs of individuals who are homeless or at risk of homelessness, extremely low-income seniors and persons with disabilities and households who are rent-burdened or live in substandard housing. Commerce encourages all applicants to develop affordable housing that addresses the needs of their community’s most vulnerable families and individuals; however, Commerce does not mandate the types or locations of projects that are submitted. Commerce accepts applications from all eligible entities working to meet the highest and most critical housing needs in local communities. Projects awarded are detailed in Table CR-1. All awards will address the highest and most critical housing needs of families and individuals in Montana.

CDBG Housing assisted one moderate-income household with homeowner housing rehabilitation during the 2025-2026 program year. HOME assisted eight extremely low-income households, twelve low-income households and fifteen moderate-income households. Of the twenty homebuyers assisted, six households had incomes below 50% AMI, four with incomes between 51% and 60% and the remaining ten with incomes between 61% and 80%. HOME-ARP assisted eight households that were experiencing

homelessness through rental housing rehabilitation. HTF assisted twelve extremely low-income households, four of which were senior households in one rental rehabilitation project and the other eight were experiencing homelessness before securing housing at the other HTF-assisted rental property that was completed during Plan Year 1. While a few of the objectives for the 2025-2026 program year fell short of the goals, there are over a dozen projects expected to be completed during Plan Year 2. Due to the complexity and timeline of these projects, Commerce expects that the five-year goals will be met and annual goals will exceed expectations when projects are completed.

CR-25 — Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

DPHHS coordinates and aligns its Emergency Solutions Grant goals with the efforts of the Montana Continuum of Care. The continued role of the MTCoC is critical to effectively addressing the needs of individuals and families experiencing homelessness across Montana.

The MTCoC works to integrate and leverage federal, state and local resources to maximize impact. It promotes access to services through coordinated entry systems, comprehensive case management and service delivery at the local level. This is achieved by fostering strong local continuum of care networks that convene homeless service providers to identify community needs, address service gaps, coordinate care across programs and develop innovative strategies to reduce and ultimately end homelessness.

Outreach efforts — particularly to unsheltered individuals — are primarily conducted through emergency shelter providers, veteran-serving organizations, faith-based groups and other local programs. While ESG funding can support street outreach activities, due to identified needs in local communities and limited ESG funding, ESG funds were not used to support street outreach activities.

Coordinated entry systems implemented statewide ensure a standardized approach to intake and assessment. These systems utilize common assessment tools and case conferencing processes to evaluate vulnerability and prioritize individuals and families with the greatest needs for available housing and supportive services.

[Addressing the emergency shelter and transitional housing needs for homeless persons.](#)

DPHHS utilized ESG funds to support emergency shelter operations in four facilities across the state. During the reporting period, these investments assisted 1,415 individuals in 1,116 households, contributing to the state's capacity to provide immediate access to safe and stable shelter for persons experiencing homelessness.

Emergency shelters play a critical role in stabilizing households in crisis and connecting them to coordinated entry, case management and housing-focused services that facilitate transitions to permanent housing.

ESG resources remain limited relative to statewide need. As a result, the majority of ESG funds are prioritized for homelessness prevention and rapid rehousing activities, consistent with HUD's emphasis on reducing inflow into homelessness and increasing exits to permanent housing. This prioritization supports system performance goals, including reducing the number of households entering homelessness and shortening the duration of homelessness.

HOME-ARP resources are being used to develop non-congregate shelters, in addition to permanent supportive housing. Furthermore, Emergency Shelter Facilities Grant

resources provided by the state are being used in seven Montana counties to develop or rehabilitate congregate and non-congregate emergency shelter facilities.

Transitional Housing: ESG is not used to support transitional housing. The point-in-time counted individuals sheltered in transitional housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are likely to become homeless after 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) and receiving assistance from public or private agencies that address housing, health, social services, employment, education or youth needs.

The DPHHS utilizes ESG funds to support homelessness prevention activities aimed at assisting households at imminent risk of homelessness. During the reporting period, 229 individuals in 126 households received homelessness prevention assistance, contributing to efforts to reduce inflow into the homeless system in alignment with HUD system performance measures.

All ESG-funded programs are required to provide housing-focused case management and to connect participants with mainstream resources to promote housing stability. These efforts include assisting clients in accessing cash benefits such as Supplemental Security Income, Social Security Disability Insurance, Veterans' Disability benefits, Temporary Assistance for Needy Families, retirement income, pensions and child support. Programs also facilitate access to non-cash benefits, including Medicaid; Medicare; the Children's Health Insurance Program; Women, Infants and Children; Veterans Affairs health services; TANF-funded childcare; and federal housing assistance programs such as Housing Choice Vouchers Section 8.

Individuals being discharged from publicly funded institutions and systems of care are served through both ESG- and Continuum of Care-funded rapid rehousing programs. While the MTCOC does not dedicate specific funding exclusively to this population, all households are prioritized based on vulnerability through the Coordinated Entry System. Standardized assessment tools and case conferencing processes ensure that individuals at highest risk — including those exiting institutions — are prioritized for available housing resources.

The Montana Department of Corrections supports reentry planning for incarcerated individuals through the development of individualized reentry plans. These efforts include identifying housing options, engaging landlords, conducting site reviews to ensure safe and appropriate housing placements and coordinating with community-based service providers to support successful reintegration.

Additionally, the Montana Statewide Reentry Task Force convenes stakeholders to review barriers and develop policy recommendations aimed at improving housing stability and service access for individuals reentering communities after incarceration.

Together, these coordinated efforts support the state's objectives of preventing homelessness among low-income and extremely low-income households, including those transitioning from institutional settings, while advancing HUD's goals of reducing entries into homelessness and promoting long-term housing stability.

With its FY2026 PHA Administrative Plan, effective July 1, 2025, the statewide Commerce Public Housing Authority adopted a local waitlist preference for up to 75 persons who are active participants in Montana's treatment court system. To be eligible for the waitlist preference, the person must be actively enrolled in treatment court, provide written verification from an authorized Montana treatment Court representative, and this written verification must indicate that the person is in good standing and in compliance with all Montana treatment court requirements. As of May 2026, three participants have successfully used their vouchers to lease a rental home on the private

market, and three applicants are currently searching for units. Commerce PHA staff are engaging treatment court staff to encourage treatment court case managers to be proactive in assisting their clients through the process to increase the success of this waitlist preference.

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.

DPHHS ensures that all ESG subrecipients actively participate in the MTCoC, supporting a coordinated, statewide approach to reducing and ending homelessness. Through this collaboration, stakeholders consistently identify the shortage of affordable housing as the most significant barrier to achieving positive housing outcomes, followed by the need for increased investment in permanent supportive housing.

Efforts to assist homeless individuals and families in transitioning to permanent housing are guided by coordinated entry processes. These systems utilize standardized vulnerability assessments and case conferencing to prioritize assistance for populations with the greatest needs, including chronically homeless individuals and families, households with children, veterans and unaccompanied youth. This approach aligns with HUD system performance measures focused on reducing the length of time persons experience homelessness and increasing exits to permanent housing.

ESG funds support rapid rehousing activities designed to quickly move households from homelessness into permanent housing and promote long-term stability. During the reporting period, RRH services assisted 332 individuals in 244 households. These services include short- to medium-term rental assistance, housing search and placement

and housing-focused case management to help participants secure and maintain permanent housing.

In addition, ESG-funded programs connect participants to mainstream resources and community-based supports to enhance income stability and self-sufficiency, reducing the likelihood of returns to homelessness. Collectively, these efforts contribute to improved system performance by shortening episodes of homelessness, increasing access to permanent housing and preventing recidivism among households that have exited homelessness.

Permanent supportive housing: Permanent supportive housing provides long-term housing with supportive services for persons with disabilities experiencing homelessness, allowing them to live independently in a permanent setting. ESG funds are not used for a permanent supportive housing program; however, HOME and HTF funds were awarded to a historic rehab property that leased up during 2025 and is now providing 25 PSH units. HOME-ARP funds have been used to construct a rental property that is currently being leased to qualifying populations in the project's eight new units.

Beds provided with HOPWA funds are reported in the HOPWA APR, since the state receives a competitive HOPWA award and not a formula grant.

Currently, neither TANF nor Medicaid is used to provide homeless housing assistance.

CR-30 — Public Housing 91.220(h); 91.320(j)

[Actions taken to address the needs of public housing](#)

While HTF, HOME and CDBG funds are not used for public housing investment, these resources are available to public housing authorities for the development of other, non-public affordable housing.

All needs, including public housing needs, are assessed by gathering and evaluating data and soliciting citizen and community input. While some identified needs may fall outside the scope of the HTF, HOME and CDBG programs, Commerce can and does work collaboratively with others to ensure that comprehensive and statewide strategies for addressing all priority needs are in place.

[Actions taken to encourage public housing residents to become more involved in management and participate in homeownership](#)

All applications for homebuyer assistance under the HOME Program identify whether prospective homebuyers come from public housing. Divisions within Commerce work collaboratively to encourage low- and moderate-income residents, including public housing residents, to attend homebuyer education courses offered throughout the state by various qualified providers. These courses are advertised statewide with key partner agencies and through a multimedia marketing approach. Various public housing authorities in the state have resident advisory committees or similar organizations; public housing residents are encouraged to participate in RACs or other PHA advisory and governance committees.

Consolidated Plan documents are made available at various repositories where public housing residents are likely to seek services. All Montana citizens, including public housing residents, are encouraged to actively engage in the development and assessment processes of Montana's Consolidated Plan.

[Actions taken to provide assistance to troubled PHAs](#)

Commerce is aware of one local public housing authority in the state that is experiencing significant challenges and is in communication to assist as feasible. This local PHA has engaged the Commerce statewide PHA in the possible transfer of its remaining tenant and project-based Section 8 Housing Choice Vouchers to Commerce. This local PHA is also working with development partners on a tax-exempt bond/4% housing credit

application to rehabilitate its public housing property under the Rental Assistance Demonstration/Section 18 Blend process.

CR-35 — Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220(j); 91.320(i)

Commerce administers the Community Technical Assistance Program. CTAP provides direct technical assistance to local governments and elected officials, land use planners, associated professionals and members of the public on issues related to land use planning, regulations, housing assessments and development throughout the state.

Through CDBG funding, local communities can prepare or update various planning documents, including comprehensive land use planning documents, which identify barriers to affordable housing, such as zoning, subdivision and annexation regulations and assist communities with addressing local needs.

In 2022, Gov. Greg Gianforte established the Governor’s Housing Task Force via Executive Order No. 5-2022. The Housing Task Force, a 30-member bipartisan task force, published three written reports on Oct. 15, 2022, Dec. 15, 2022, and June 11, 2024. These reports included legislative recommendations to the governor and state elected officials, as well as recommendation for regulatory changes and best practices that could be adopted by state agencies and local governments. In response to these recommendations, Montana’s 68th Legislature passed a suite of significant land use and zoning ordinance bills, which were signed into law. These bills included, but were not limited, to:

- The Montana Land Use Planning Act, which requires local governments to plan for future housing needs and adopt pro-housing zoning reforms.

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- Revised zoning laws related to accessory dwelling units to give landowners more freedom to respond to housing needs.
- Allowing for duplex, triplex and fourplex housing in city zoning, to end exclusionary zoning and increase access to starter homes and “missing middle” housing.
- Revised municipal zoning to allow multifamily and mixed-use development, to build denser homes in urban areas and protect our open spaces from sprawl.

As communities enact and comply with the new land use planning bills, there has been an increase in requests for planning dollars and technical assistance to identify new strategies to reduce the barriers to affordable homes in Montana. Assessing the comprehensive housing need is the first step, followed by identifying appropriate sites and adapting the regulations to clearly remove the regulatory barriers.

On Jan. 4, 2025, HUD announced \$100 million in awards to communities to boost housing supply and lower housing costs with the Pathways to Removing Obstacles to Housing Program. The state was awarded a \$7 million PRO Housing grant to assist with land use updates, public engagement and data analysis. This funding will incentivize affordable housing development and support homeownership for families of modest means. Commerce is working with the Montana League of Cities and Towns to provide \$5 million of the PRO Housing grant to the 11 Montana LUPA communities to complete the planning and public participation work needed to meet the May 17, 2026, deadline for compliance with the act. The remaining \$2 million will be used to create programs that communities statewide can access to further incentivize affordable housing development.

[Actions taken to address obstacles to meeting underserved needs. 91.220\(k\); 91.320\(j\)](#)

All the activities funded under the CDBG, HOME, HTF and ESG programs addressed obstacles to meeting underserved needs. CDBG, HOME and HTF all promote projects

that align with the resiliency goals set forth by Commerce, which include projects aimed at strengthening local independence, stability and sense of community.

During Plan Year 1, the CDBG, HOME and HTF programs awarded grants to projects that will provide clean, safe, affordable, decent and sanitary housing for underserved and special needs populations.

Coordinated Entry Systems across the state provide for uniform intake and assessment of ESG — and partnering programs using the local assessment tools and case conferencing — to score vulnerability levels and prioritize those most in need for available housing opportunities.

[Actions taken to reduce lead-based paint hazards. 91.220\(k\); 91.320\(j\)](#)

The state diligently undertakes rehabilitation and construction activities to ensure that households, particularly those with children, benefiting from federal housing programs are safe from lead based paint 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 and LSHR, inspections are performed on all homes (renter or owner-occupied) assisted with HTF, HOME, Section 8 Housing Choice Vouchers and other public funds.

State staff conducting site inspections complete training on HUD's inspection protocol as well as HUD's online LBP Visual Assessment Training.

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

[Actions taken to reduce the number of poverty-level families. 91.220\(k\); 91.320\(j\)](#)

The state, in coordination with nonprofit organizations and the private sector, works 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 the Consolidated Plan and AAP target the improvement of economic conditions for Montanans of low- to moderate-income, from the rehabilitation and new construction of affordable units, homebuyer assistance and temporary shelter services to investment in compact, walkable development where efficiencies of public infrastructure, community services and employment centers encourage healthy, vital and resilient communities.

All HOME and HTF housing activities and all CDBG Housing, Public and Community Facilities and Economic Development activities target extremely low-, low- and moderate-income households and either directly or indirectly benefit poverty-level families.

[Actions taken to develop institutional structure. 91.220\(k\); 91.320\(j\)](#)

Gaps in the institutional delivery system exist primarily due to funding limitations that are outside the control of the state. CDBG, HOME, HTF and ESG resources are not adequate to meet the needs of Montanans with less than low to moderate incomes, particularly the homeless, disabled, elderly and other disadvantaged populations. However, the ability to effectively relay information regarding existing grant opportunities and technical assistance from the state to eligible entities continues to be one of Montana's greatest challenges. There are areas of opportunity for increased collaboration vertically and horizontally, as well as across and between agencies,

organizations and the private sector to ensure that services are delivered to the greatest number of eligible entities and individuals in the state.

During Plan Year 1, both vertical and horizontal collaboration were emphasized with Commerce's Community MT Division and Housing MT Division working closely together, along with DPHHS and the MTCoC, to address housing and healthcare needs in Montana. One example is the PRO Housing application. Another example is recent collaborative efforts to expand the state's Olmstead Plan.

[Actions taken to enhance coordination between public and private housing and social service agencies. 91.220\(k\); 91.320\(j\)](#)

Commerce pursues opportunities to coordinate with public and private housing and social service agencies and partners. Coordination occurs during the execution and completion of planning and development projects.

DPHHS is represented on various state advisory groups to ensure coordination of 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 and DPHHS continue to work with a vast array of public entities and key stakeholders through numerous public meetings to further fair housing initiatives.

[Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520\(a\)](#)

In 2024, Commerce hired a consultant to lead efforts to develop Montana's Fair Housing Plan. An extensive process to collect and analyze data and public input took place throughout 2024. The Fair Housing Plan provides important data to stakeholders working to remove and ameliorate the negative effects of public policies currently serving as

barriers to affordable housing and fair housing choice. Commerce submitted Montana's Fair Housing Plan to HUD in September 2024 and used its findings to inform Montana's 2025-2029 Consolidated Plan.

CR-40 — Monitoring 91.220; 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

Commerce works closely with all grantees and owners to ensure compliance with program requirements. The HOME, CDBG and HTF programs continually evaluate and improve processes to ensure compliance with federal regulations. Program staff hold regular calls with grantees and owners to deliver technical assistance in every phase of a project.

CDBG project activities are all monitored at least once during the project's scope of work. The monitoring includes a review of the grantee's project file, an inspection of the facility and a review of the financial processes. Program staff work with grantees and relevant partners to schedule monitoring visits, providing ample notice and sufficient details to ensure a productive and thorough monitoring. If issues are observed or technical assistance is needed, a project may be monitored more than once before closeout. After a project has been monitored, Commerce issues a monitoring letter documenting performance issues, concerns or findings and relevant corrective actions, as applicable.

HOME and HTF project activities are monitored at various stages during a project's life. Commerce staff conduct construction monitoring to verify work is underway and to provide technical assistance as needed. Final monitoring includes a visit to the construction site at project completion to conduct a detailed file audit of all relevant records and documents related to the project, as well as HUD-compliant inspections to

ensure the project is prepared for closeout. HOME and HTF projects are then monitored during the first three years of their periods of affordability, with the first monitoring occurring within one year of project closeout per HUD regulations. These initial monitoring visits provide the grantee with an opportunity to receive HOME and HTF program training and technical assistance. After the first three years of the period of affordability, project monitoring occurs every one to three years depending on assessed risk. During all period of affordability monitoring, a property inspection as well as a file review to verify tenant income eligibility, rent limit compliance and proper documentation is completed for a sample of assisted units. Additionally, HOME and HTF grantees submit rent and occupancy information annually to Commerce reporting on beneficiaries, rent structure, changes to leases or tenant selection policies and property financials. Monitoring visits also help verify the information submitted in rent and occupancy reports.

During Plan Year 1, one CDBG housing project, four HOME and HOME-ARP projects and two HTF projects were monitored during project completion visits. In addition, seven CDBG and CDBG-CV projects, eight HOME and HOME-ARP projects and four HTF projects were monitored during construction progress visits.

During Plan Year 1, Commerce staff conducted period of affordability monitoring on-site visits to thirty-seven HOME and six HTF properties. See **Appendix B** for a complete list of the projects and CR-50 for more information. None of the properties monitored reported requests by residents for emergency transfers. A handful of properties monitored reported requests for reasonable accommodations, as detailed in **Appendix B**.

All eight ESG subrecipients were monitored with a combination of on-site visits and desk monitoring.

Monitoring activities completed for the HOPWA Program are reported in the HOPWA APR since the state receives a competitive HOPWA award and not a formula grant.

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Commerce announces the availability of draft documents through its website, print ads in newspapers across the state, and a listserv of approximately 5,000 individuals, towns, counties, nonprofits and interested parties. The draft documents are available electronically on Commerce’s website and in hard copy at 22 repositories across Montana. The draft documents are also available upon request.

Citizens are invited to comment on draft documents via oral testimony during in-person or virtual public hearings or via written statements provided through email or regular mail. Citizens are provided reasonable accommodations and alternative formats of draft documents and hearing materials upon request.

The public comment period for the Draft 2025-2026 CAPER began on May 26, 2026, and ended June 12, 2026. A virtual public hearing was held June 10, 2026. An official transcript of the public hearing, a record of all comments considered and responses provided are included in **Appendix A**.

CR-45 — CDBG 91.52(d)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

There have not been any changes in Commerce’s program objectives during Plan Year 1.

Does this jurisdiction have any open Brownfields Economic Development Initiative grants?

No.

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

N/A.

CR-50 — HOME 91.520(e)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

As described in CR-40, HOME projects under construction are monitored two or more times during the award period. At least one construction site visit and one full monitoring visit are conducted, which includes a full review of the grantee file and inspection of the HOME-assisted project and units. Projects are then monitored during the first three years of the period of affordability and then every one to three years thereafter depending on assessed risk.

See **Appendix B** for a table of HOME projects monitored between April 1, 2025, and March 31, 2026. The appendix also provides information regarding requests for emergency transfers and reasonable accommodation. Note there were no monitored properties with emergency transfers requested.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units.
92.351(b)

Commerce reviews all Affirmative Fair Housing Marketing Plans for HOME-assisted projects. Each project with five or more HOME-assisted units is required to complete and submit an AFHMP for review and approval. During the annual rental certifications, Commerce requests that all updated documentation be submitted and kept in project records. Commerce provides technical assistance for updating AFHMPs to grantees and property owners/managers during the construction phase and on an ongoing basis during the period of affordability.

Provide data on the amount and use of program income for projects, including the number of projects and owner and tenant characteristics.

As reflected in IDIS Report PR09, HOME began the program year with no program income and received and expended \$848,181.61 in program income during the program year. Of those funds, \$34,264.15 of HOME program income was used to acquire one unit. This acquisition benefited one household with income between 61% and 80% AMI. Downpayment assistance totaling \$813,917.46 went to first-time homebuyers, benefiting 19 households. These households included six with incomes between 31% and 50%, four with incomes between 51% and 60% and nine with incomes between 61% and 80%.

Describe other actions taken to foster and maintain affordable housing. 91.220(k)
(STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

Within Commerce and the administratively attached Montana Board of Housing, managers who oversee the Low-Income Housing Tax Credit, HUD CPD programs and rental assistance programs work together to foster and maintain affordable housing in Montana. LIHTC is often a leveraged funding source for HOME, HTF and CDBG housing projects. In recent years, the Commerce statewide PHA has awarded project-based vouchers at two properties that also received LIHTC allocations and HUD CPD awards. The LIHTC, HOME, HTF and CDBG housing applications share similar underwriting criteria so that program requirements complement and do not contradict each other. Coordination within Commerce has aligned application deadlines and improved communications with grantees to provide for more comprehensive technical assistance at every phase of project work.

CR-55 — HOPWA 91.520(f)

Identify the number of individuals assisted and the types of assistance provided.

The number of individuals assisted and the types of assistance provided under the HOPWA Program are reported in the HOPWA APR since the state receives a competitive HOPWA award and not a formula grant.

Narrative

The state's HOPWA funds are provided via competitive award and not through a formula grant. HOPWA data for competitive awards is presented in a separate report: the HOPWA APR.

CR-56 — HTF 91.520(h)

Describe the extent to which the grantee complied with its approved HTF allocation plan and the requirements of 24 CFR part 93.

As detailed in the 2025-2026 AAP, Commerce's goal was to use its \$3,144,833.37 annual allocation to support the development and rehabilitation of rental housing. All activities meet the requirements of 24 CFR Part 93.

Two HTF activities were completed in Plan Year 1 and included the rental rehabilitation of two projects. One activity provided rehabilitation of four HTF-assisted units for seniors, and the second rehabilitated an historic building to provide eight HTF-assisted units for those experiencing homelessness. All HTF-assisted units were occupied, and the household incomes of the residents in those units were below 30% AMI. Commerce does not undertake homebuyer activities with HTF funding.

Onsite monitoring results for HTF projects under construction and in their periods of affordability are detailed in **Appendix B**. No monitored property had a request for emergency transfers.

CR-58 — Section 3

During the 2025-2026 program year, there were four CDBG activities that met Section 3 requirements, with a total of 9,955 hours and a total of 595 Section 3 workers, including 302 targeted Section 3 workers. HOME had a total of three activities, totaling 57,385 labor hours. There were a total of 549 Section 3 worker hours and no targeted Section 3 worker hours. HTF had two activities that had 20,410 total labor hours. This included 2,354 Section 3 worker hours and no targeted Section 3 worker hours.

Qualitative efforts are reported by program. CDBG included the following qualitative efforts: one direct, on-the job training; one outreach effort to help Section 3 workers compete for jobs; one promotion of a business registry designed to create opportunities for disadvantaged and small businesses; and two other undesignated efforts. HOME included the following qualitative efforts: one for each outreach effort to generate job applicants who are public housing targeted workers and other funding targeted workers; one direct, on-the job training; one division of contracts into smaller jobs to facilitate participation by Section 3 business concerns; one connection of residents with assistance; one job fair; one connection of residence with supportive services; one connection of residents to financial literacy training; and one promotion of the use of a business registry for small and disadvantaged businesses. HTF included the following qualitative efforts: three outreach efforts to generate job applicants who are public housing targeted workers and other funding targeted workers; one direct, on-the job training; one division of contracts into smaller jobs to facilitate participation by Section 3 business concerns; one job fair; and three connections of residents with supportive services.

Narrative

When the Section 3 Final Rule became effective on Nov. 30, 2020, the state switched its Section 3 reporting to IDIS for activities created in IDIS after HUD's compliance start date of July 1, 2021. When projects are completed, staff enters applicable Section 3 data in IDIS for each completed activity. CDBG, HOME and HTF projects where Section 3 is triggered — in other words, where more than \$200,000 in HUD assistance is used for housing or public facility rehabilitation or construction — often take multiple years to complete. Therefore, the narrative above contains Section 3 data for CDBG, HOME and HTF projects that were set up after July 1, 2021, and were completed in Plan Year 1. These CDBG, HOME and HTF projects are funded from CPD allocations from various program years.

CR-60 — ESG 91.520(g)

ESG Supplement to the CAPER in SAGE for Paperwork Reduction Act

1. Recipient information — all recipients complete

Basic Grant Information	
Recipient name	Montana
Organizational DUNS number	809790579
UEI (SAM)	TR3DAXR9MCN8
EIN/TIN number	810302402
Identify the field office	Denver
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Montana CoC

ESG Contact Name	
Prefix	Ms.
First name	Sara
Middle name	
Last name	Loewen
Suffix	
Title	Bureau chief

ESG Contact Address	
Street address 1	1400 Carter Drive
Street address 2	
City	Helena
State	MT
ZIP code	59620


COMMERCE

Phone number	406-447-4265
Extension	
Fax number	
Email address	slowen@mt.gov

ESG Secondary Contact	
Prefix	Mrs.
First name	Julianna
Last name	Campbell
Suffix	
Title	Community services section supervisor
Phone number	406-329-1612
Extension	
Email address	julianna.campbell@mt.gov

2. Reporting period — all recipients complete

Program year start date	April 1, 2025
Program year end date	March 31, 2026

3. Subrecipient form — complete one form for each subrecipient

Subrecipient or contractor name	Northwest Montana Human Resources
City	Kalispell
State	MT
ZIP Code	59903-1058


COMMERCE

DUNS Number	
Is subrecipient a victim services provider?	N
Subrecipient organization type	Other nonprofit organization
ESG subgrant or contract award amount	\$55,664

Subrecipient or contractor name	HRDC of District IX, Inc.
City	Bozeman
State	MT
ZIP code	59715-6241
DUNS number	
Is subrecipient a victim services provider?	N
Subrecipient organization type	Other nonprofit organization
ESG subgrant or contract award amount	\$131,512.13

Subrecipient or contractor name	Human Resource Council
City	Missoula
State	MT
ZIP code	59801-5763
DUNS number	
Is subrecipient a victim services provider?	N
Subrecipient organization type	Other nonprofit organization
ESG subgrant or contract award amount	\$135,155

Subrecipient or contractor name	Action Inc. — Human Resources Council District XII
City	Butte


COMMERCE

State	MT
ZIP code	59701-9362
DUNS number	
Is subrecipient a victim services provider?	N
Subrecipient organization type	Nonprofit organization
ESG subgrant or contract award amount	\$51,064

Subrecipient or contractor name	Rocky Mountain Development Council, Inc.
City	Helena
State	MT
ZIP Code	59624-1717
DUNS number	
Is subrecipient a victim services provider?	N
Subrecipient organization type	Other nonprofit organization
ESG subgrant or contract award amount	\$60,764

Subrecipient or contractor name	HRDC District 7
City	Billings
State	MT
ZIP Code	59101-2114
DUNS Number	
Is subrecipient a victim services provider?	N
Subrecipient organization type	Other nonprofit organization
ESG subgrant or contract award amount	\$178,097.87


COMMERCE

Subrecipient or contractor name	District 6 — HRDC VI
City	Lewistown
State	MT
ZIP code	59457-1700
DUNS number	
Is subrecipient a victim services provider?	N
Subrecipient organization type	Other nonprofit organization
ESG subgrant or contract award amount	\$17,215

Subrecipient or contractor name	Opportunities Incorporated
City	Great Falls
State	MT
ZIP code	59401-2605
DUNS number	
Is subrecipient a victim services provider?	N
Subrecipient organization type	Other nonprofit organization
ESG subgrant or contract award amount	\$111,902