



# Disaster Housing Strategy

**State of Montana**

May 2025

**Montana Department of Commerce**  
P.O. Box 200528  
Helena, MT 59620-0528  
Phone: 406-841-2840 | Fax: 406-841-2841  
[commerce.mt.gov](http://commerce.mt.gov)  
Montana 711: [montanarelay.mt.gov](http://montanarelay.mt.gov)

# Table of Contents

<b>Introduction</b> .....	<b>3</b>
Mission Statement.....	3
Vision.....	3
Values .....	3
Purpose.....	3
Scope and Goals.....	4
Disaster Housing Working Group.....	5
Disaster Housing Strategy Activation Triggers.....	8
Disaster Housing Strategy Deactivation Triggers .....	9
Assumptions.....	9
Reference Documents .....	10
Strategy Maintenance .....	10
<b>Overview</b> .....	<b>12</b>
Disaster Housing Options .....	12
Risk Assessment.....	13
<b>Concept of Operations</b> .....	<b>17</b>
Phase 1 – Immediate Response and Initial Damage Assessment .....	18
Phase 2 – Short-Term Housing Solutions .....	32
Phase 3 – Intermediate Recovery and Reconstruction Planning.....	37
Phase 4 – Long-Term Housing Recovery and Resilience Building.....	40
Establishing Resource Sharing Agreements.....	43
<b>Transition Between Disaster Phases</b> .....	<b>46</b>
Disaster Phases .....	46
Transition Criteria.....	48
Sequence of Delivery .....	50
Emergency Support Functions and Recovery Support Functions .....	52
<b>Appendix 1: Planning, Preparedness and Funding Opportunities</b> .....	<b>56</b>
Investing in Affordable and Resilient Housing.....	56

Promoting Fair and Equitable Housing .....	62
State Funding Opportunities .....	62
Federal Funding Opportunities.....	64
<b>Appendix 2: Training and Education .....</b>	<b>66</b>
Federal Training and Education .....	66
Montana Training and Education .....	67
<b>Appendix 3: Recovery Support Function 4 (Housing) Overview .....</b>	<b>68</b>
<b>Appendix 4: Disaster Housing Working Group Roles and Responsibilities.....</b>	<b>73</b>
Disaster Housing Working Group Core Member Roles and Responsibilities .....	73
Disaster Housing Working Group Incident-Specific Members Roles and Responsibilities .....	79
<b>Appendix 5: Sheltering for Catastrophic Events .....</b>	<b>85</b>
<b>Appendix 6: Sheltering Identification .....</b>	<b>89</b>
National Shelter System.....	89
American Red Cross Database.....	89
State of Montana Shelter Tracking.....	89
<b>Appendix 7: Lessons Learned and Best Practices .....</b>	<b>90</b>
<b>Appendix 8: Pre-Disaster Housing Planning Initiative Next Steps .....</b>	<b>94</b>

## Introduction

### Mission Statement

The **Mission** of the State of Montana’s Disaster Housing Strategy is to articulate roles and responsibilities to effectively support housing recovery in local communities following a disaster.

### Vision

The **Vision** of the State of Montana’s Disaster Housing Strategy is to help residents impacted, or at risk of being impacted, by a disaster to recover, repair and replace their homes in a decent, safe, sanitary, timely and resilient manner.

### Values

The list below documents the **Core Values** that drive the State of Montana’s Disaster Housing Strategy:

- Resilient
- Collaborative
- Environmental Stewardship
- Transparent
- Affordable
- Safety
- Innovative
- Engagement

### Purpose

The State of Montana’s Disaster Housing Strategy aims to augment existing planning documents to provide additional clarity on roles and responsibilities for supporting disaster housing operations. It describes the state coordination of disaster housing assistance in preparation for, response to and recovery from all levels of disasters, including catastrophic events. This Strategy defines the roles, programs, authorities and

responsibilities of all entities, emphasizing the cooperative efforts required for disaster survivors and affected communities to recover from disasters.

Additionally, this Strategy outlines the activities that will be pursued in moving toward accomplishing the goals of the National Disaster Housing Strategy (<https://www.fema.gov/pdf/emergency/disasterhousing/NDHS-core.pdf>). Implementing the Strategy strengthens the state's collective capability to fulfill all partner responsibilities for the citizens of the State of Montana in times of a disaster or emergency, regardless of cause, scope or complexity.

This Strategy is a “**living document**” that will be regularly and routinely updated to maintain a comprehensive housing management resource for all disasters. It serves as a tool to facilitate the goals presented in this Strategy.

## Scope and Goals

There will be events that impact the State of Montana that include the displacement of individuals and families from their primary residences. Typically, response, relief and recovery efforts are managed locally. However, as the magnitude of impact is realized, the number of stakeholders engaged will expand accordingly to ensure that sufficient resources can be accessed. If an event exceeds the capability of the local jurisdiction, the State of Montana will bring its resources to aid the local jurisdiction.

The goal of the Disaster Housing Strategy is to provide an integrated framework to help the State of Montana prepare for pre-disaster housing and respond to post-disaster housing needs generated by both non-Presidential and Presidentially-declared disasters and emergencies. These needs span the disaster housing continuum, from sheltering through temporary, or interim, accessible housing and ultimately to repairs, rehabilitation and reconstruction of accessible permanent housing. The focus of this Strategy is to provide guidance for supporting local efforts to provide interim and eventual permanent housing solutions for displaced disaster survivors. Immediate

emergency assistance and sheltering needs following a disaster are addressed in Montana's Emergency Response Framework.

True housing resiliency will result from a combination of efforts:

- Promote efforts to strengthen existing housing to be more resilient against future disasters;
- Building housing that is strengthened to mitigate the impacts of environmental factors (e.g., severe weather, earthquakes, power outages, etc.) via improved building codes, systems and construction methods and;
- Expanding the supply of housing at all price points, but specifically for the spectrum of low-to-moderate-income residents.

It is important to note that the guidance outlined in this Strategy is intended to serve as a general framework for consideration and planning. They are not prescriptive or exhaustive. The actual implementation of any strategy will be influenced by a variety of factors, including the unique characteristics of each emergency or disaster, available resources, jurisdictional capabilities and the evolving nature of housing needs. Users of this Strategy are advised to remain flexible and to adapt all actions and decisions to the specific context and demands of each event.

## **Disaster Housing Working Group**

### **Organization**

The Disaster Housing Working Group consists of several organizations who play a key role during both pre- and post-disaster operations as it relates to housing needs. The function of the Montana Disaster Housing Working Group is to plan and provide expertise/advisory assistance for the congregate, transitional, interim and permanent

housing needs of survivors in the aftermath of a disaster. The State of Montana, in coordination with local, federal and tribal partners, will seek to provide survivors with a range of options, maximizing their ability to attain reasonable housing solutions.

The Disaster Housing Working Group is broken up into a **Core Group** of organizations who support planning during steady state operations as well as during disaster times.

The Disaster Housing Working Group is further broken down into additional **Incident-Specific** organizations that are activated on an as-needed basis depending on the size, scope and complexity of the disaster. Further details on the specific roles and responsibilities of all organizations within the Disaster Housing Working Group are included in **Appendix 4: Disaster Housing Working Group Roles and Responsibilities**.

For additional information on the roles and responsibilities of the Disaster Housing Working Group compared to other state response and recovery structures, please see **Emergency Support Functions and Recovery Support Functions**.

### **Disaster Housing Working Group – Core Members**

- State of Montana
  - Montana Department of Commerce
    - Housing Division (lead facilitator)
    - Community MT Division
  - Montana Disaster and Emergency Services
    - Mitigation and Recovery Bureau
  - Montana Department of Public Health and Human Services
- Local and Non-Governmental
  - Local Public Housing and Tribal Authorities
  - Montana Association of Counties
  - Montana League of Cities and Towns
  - Industry Associations

- Local Emergency Managers (coordinated through Montana Disaster and Emergency Services)
- Federal
  - U.S. Federal Emergency Management Agency
  - U.S. Department of Housing and Urban Development
  - U.S. Department of Commerce, Small Business Administration

### **Disaster Housing Working Group – Incident-Specific members**

- State of Montana
  - Montana Department of Environmental Quality
  - Department of Labor and Industry/Division of Insurance
  - Department of Natural Resources and Conservation
  - Governor’s Office of Indian Affairs
- Local and Non-Governmental
  - Montana Voluntary Organizations Active in Disaster
  - Centers for Independent Living
  - American Red Cross
  - Salvation Army
  - United Way
  - Food Bank Network
  - Montana Continuum of Care Coalition
- Federal
  - U.S. Department of Agriculture/Rural Development
  - U.S. Department of Treasury

### **Operations**

The Disaster Housing Working Group serves as the main coordination and advisory body of housing recovery operations for the State of Montana. The Housing Division

within the Montana Department of Commerce serves as the main facilitator for this group and will coordinate with other Core Member organizations after a disaster or emergency to support recovery planning and strategy development related to housing needs.

While the Commerce Housing Division oversees the Disaster Housing Working Group and this Disaster Housing Strategy, the Montana Disaster and Emergency Services, State Emergency Coordination Center is responsible for activating additional Incident-Specific Member organizations depending on the size, scope and complexity of the disaster. Once these organizations have been activated, this group should leverage standard methods of communication (e.g., email) to develop and review housing strategies. Furthermore, it is recommended that this group establish a meeting cadence, during both emergency times and during blue sky times, to support collaboration and open communication.

With regards to activation, the Disaster Housing Working Group may be activated for small/isolated incidents or emergencies (e.g., individual apartment fires) as circumstances dictate on a case-by-case basis all the way up to large-scale disasters.

## **Disaster Housing Strategy Activation Triggers**

In alignment with the Montana Disaster Recovery Framework, this Disaster Housing Strategy may be implemented or activated by the Disaster Housing Working Group following a large-scale or catastrophic level event that involves one or a combination of the following characteristics:

- The event requires a higher level of coordination among state departments to address housing needs;
- The event displaces a large percentage of people from their homes;
- The event creates widespread damage to infrastructure, including public works and transportation systems, that support housing activities;

- The event persists for an extended duration or scope; and/or,
- The event exceeds the capacity of state resources and operations to address housing needs.

## **Disaster Housing Strategy Deactivation Triggers**

This Disaster Housing Strategy may be demobilized or deactivated by the Disaster Housing Working Group when one or a combination of the following characteristics have been met:

- Although housing operations/activities may still be ongoing, they can be carried out by independent agencies or entities without the need for additional coordination among state departments;
- Identified housing/recovery objectives following the large-scale or catastrophic event have been met;
- The demand for housing services no longer exceeds the steady-state capabilities of responding organizations; and/or,
- There is no longer a need for a higher-level coordination among state departments to address housing needs.

## **Assumptions**

In addition to the assumptions outlined in the Montana Disaster Recovery Framework, this Disaster Housing Strategy was developed based on the following additional assumptions:

- There are a range of events/incidents that could impact the State of Montana. As such, the Disaster Housing Working Group will need to assess housing impacts and needs following each event and tailor housing recovery activities based on the size and scope of the incident.

- As documented earlier in this Disaster Housing Strategy, there are Core Members as well as Incident-Specific Members of the Disaster Housing Working Group. It is the responsibility of the Core Members to identify and activate Incident-Specific Members to support housing activities after an event based on specific housing gaps and needs.

## Reference Documents

The following resources were leveraged to support the development of this strategy:

- [Montana Emergency Response Framework](#)
- [State Emergency Coordination Center Operations Plan](#)
- [Montana Disaster Recovery Framework](#)
- [Montana Recovery Support Function #4 – Housing](#)
- [Montana's 2024 Fair Housing Equity Plan](#)

## Strategy Maintenance

This Disaster Housing Strategy is a living document and should be reviewed regularly and updated as necessary by the Disaster Housing Working Group, **at a minimum every three years**. The Montana Department of Commerce Housing Division is the custodian of this plan, with support from Montana Disaster and Emergency Services, and is responsible for distribution, updates and revisions. Elements that should be considered when implementing routine updates include, but are not limited to:

- Changes in State of Montana statutes;
- Findings/recommendations identified from trainings or exercises;
- Changes in resources or funding allocation; and/or
- Changes in agency structure/staffing.

The custodian is responsible for seeking input from all relevant partners identified in this Strategy during the review and revision process. Once edits are complete, the custodian is also responsible for first obtaining the appropriate approval and sign-off on the Strategy and then socializing the updated Strategy, flagging all changes with all relevant state partners. Minor edits, revisions, or updates do not require approval or re-authorization of the Strategy; however, the Strategy and accumulated revisions should be re-authorized **at least every five years**.

## Overview

Consistent with the National Incident Management System, disaster recovery will be coordinated at the local level wherever possible. The State of Montana's role will be to assist in recovery efforts when the required actions are beyond the capacity of the local jurisdiction(s) impacted by a hazard. When county and tribal resources are overwhelmed, local authorities may request assistance in accordance with the emergency management structure (e.g., the Montana Emergency Response Framework) in the State of Montana.

To achieve the overall objective, the Disaster Housing Strategy will provide a framework for coordinating and providing disaster housing assistance. The Strategy addresses the spectrum of options from transitional/interim housing to permanent housing solutions for residents. This document details a range of housing options based upon the severity and magnitude of the disaster.

A disaster can be defined as either Non-Presidential or Presidential:

- **Non-Presidential Disaster:** Declared by the Governor of Montana based upon the level of damage incurred in the local community(s).
- **Presidential Declaration:** Determined when the level of damage is greater than what the state and local resources can support.

During both Presidential and Non-Presidential disasters, there are critical "transition periods" whereby specific processes are carried out to implement a seamless flow of operations. As residents transition back into their community, it is the desire of the Disaster Housing Working Group to ensure available housing options to provide a safe, secure and sanitary environment.

## Disaster Housing Options

Some housing programs span different periods as they may be initiated during an early stage and continue for months or years. Not all the programs represented are available for each disaster, and some programs are available during non-disaster times. The availability of programs may be dependent on the size of the event and the scope of each federal agency's role in the recovery mission.



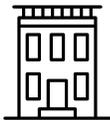
**Emergency/Congregate Sheltering** is the immediate housing option for survivors following a disaster to ensure a safe and sanitary environment (estimated between 1 – 15 days).



**Transitional Housing/Sheltering** is needed to remove survivors from the disaster site for an extended period of time to ensure their safety (estimated between 15 – 30 days).



**Temporary/Interim Housing** is defined by the length of stay. 30 days up to two years is a general timeframe for temporary housing. Apartments, condos and rental homes are common housing options (estimated between 30 – 180 days).



**Permanent Housing** is defined as a long-lasting housing option. A permanent renter is one who may live in a rental home or apartment and that may be determined to be their “permanent” housing option. Other applicants may own a home, condo, or mobile unit (estimated to be 30 days and beyond).

## Risk Assessment

The State of Montana, through the Hazard Mitigation Grant Program and Threat and Hazard Identification and Risk Assessment/Stakeholder Preparedness Review, conducted a full risk assessment of every hazard the state may face. Elements considered as part of this risk assessment include historical events, future probability, high hazard areas and historical costs to the state. More information on the results of

the State of Montana’s risk assessment can be accessed here:

<https://des.mt.gov/Mitigation/Mitigation-Planning>.

The 2023 Montana Hazard Mitigation Plan details 11 natural, accidental human-caused, intentional human-caused and technological hazards that could potentially threaten lives, property and the environment. These hazards are listed in priority ranking below:

1. Wildland and Rangeland Fire
2. Flooding
3. Drought
4. Severe Weather (Winter and Summer)
5. Earthquake
6. Disease
7. Hazardous Materials and Transportation Accidents
8. Terrorism, Violence, Civil Unrest and Cyber Security
9. Dam Failure
10. Landslides and Avalanches
11. Volcanic Ash

## High-Risk Populations and Areas

According to the Montana Disaster Recovery Framework, there are 56 counties, 624 cities and towns and eight federally recognized sovereign Tribal Nations across the State of Montana. Of the 56 counties in the state, 45 have population densities of less than six persons per square mile. According to the estimated July 1, 2022, U.S. Census data, Montana has an estimated population of 1,122,878, with most of the growth occurring within Yellowstone, Gallatin, Missoula, Flathead, Cascade, Lewis and Clark and Ravalli Counties. The 2023 update of the State of Montana’s Multi-Hazard Mitigation Plan indicates high-risk populations and areas through hazard-specific risk maps and socially vulnerable population groups. Hazards impact the regions of

Montana differently; hazard risk maps by region are available in the Hazard Mitigation Plan. Region-specific mitigation plans are currently underway.

Socially vulnerable populations are considered those more likely to experience adverse social, health or economic outcomes in the event of a hazard due to their race, age, gender, or poverty status. The Hazard Mitigation Plan and the Montana Disaster Recovery Framework identify 18 socially vulnerable population indicator groups. Details and density maps for each group can be found in the Hazard Mitigation Plan.

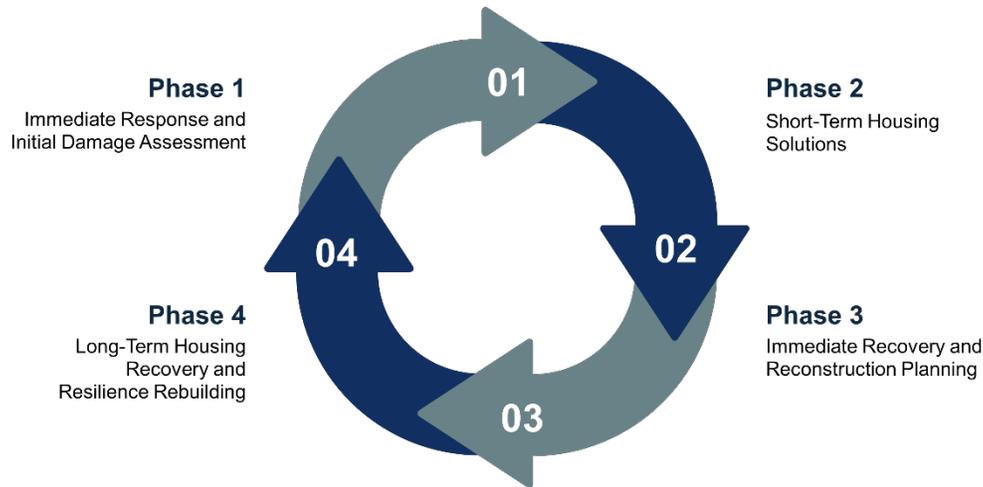
- Population under age five
- Population over age 65
- Non-White Population (all other races)
- Hispanic Population
- Population without a High School Diploma
- Population that speaks English "Not Well"
- Population in "Deep Poverty"
- Families Below Poverty
- Families that are Single Mother Households and Below Poverty
- Households Receiving Food Stamps
- Population that "Did Not Work"
- Rentals where Gross Rent Exceeds 30% of Household Income
- Housing that is Mobile Homes
- Households that are Single Female with Children under age 18
- Households with no Car
- Population over age 65 and Living Alone
- Population with Disabilities
- Population without Health Insurance

High-risk populations and areas can be used as a guide for housing planning considerations and allocation of resources.



# Concept of Operations

Following a disaster, housing recovery is a critical priority for the State of Montana to ensure the stability and resilience of affected communities. This Concept of Operations outlines the strategic approach the state should take to coordinate housing recovery efforts, ensuring an efficient and equitable rebuilding approach.



This Concept of Operations serves as a foundational framework to guide response and recovery efforts. However, the actual needs, actions and resource requirements will vary based on the size, scale and complexity of each disaster. Stakeholders should view this document as a starting point, adapting and tailoring it to align with their specific operational needs, capabilities and jurisdictional requirements. Flexibility and situational awareness will be critical in ensuring an effective and coordinated response.

Phase	Description	Key Activities
<b>Phase 1 – Immediate Response and Initial Damage Assessment</b>	This phase focuses on the initial period immediately following a disaster. Activities focus on addressing the initial needs of impacted communities	<ol style="list-style-type: none"> <li>1. Activate the appropriate members of the Disaster Housing Working Group</li> <li>2. Conduct recovery needs and housing impact assessment</li> <li>3. Activate emergency sheltering resources</li> <li>4. Implement temporary housing assistance</li> </ol>

Phase	Description	Key Activities
	and conducting an initial assessment.	<ol style="list-style-type: none"> <li>5. Engage the necessary stakeholders to support efforts</li> <li>6. Support public communication and outreach</li> </ol>
<b>Phase 2 – Short-Term Housing Solutions</b>	This phase focuses on securing and implementing short-term housing solutions to support impacted communities in the initial weeks to months following a disaster.	<ol style="list-style-type: none"> <li>1. Support transitional housing/sheltering efforts</li> <li>2. Support Disaster Case Management</li> <li>3. Facilitate federal and state assistance programs and expand state and local housing programs</li> <li>4. Monitor and address displacement issues</li> <li>5. Develop infrastructure for temporary housing</li> </ol>
<b>Phase 3 – Intermediate Recovery and Reconstruction Planning</b>	This phase focuses on supporting intermediate housing recovery efforts and beginning to plan for longer-term housing needs, such as reconstruction planning.	<ol style="list-style-type: none"> <li>1. Develop housing recovery plans</li> <li>2. Streamline permitting and zoning adjustments</li> <li>3. Identify additional funding sources at the federal and state level</li> <li>4. Support homeowner and rental assistance programs</li> <li>5. Enhance workforce and construction capacity</li> <li>6. Coordinate buyout and relocation programs</li> </ol>
<b>Phase 4 – Long-Term Housing Recovery and Resilience Building</b>	This phase focuses on securing and implementing long-term housing solutions and supporting planning for future resiliency building efforts.	<ol style="list-style-type: none"> <li>1. Facilitate permanent reconstruction efforts</li> <li>2. Enhance building codes and land-use policies</li> <li>3. Develop affordable and sustainable housing initiatives and preparedness programs</li> <li>4. Monitor progress and adapt strategies</li> <li>5. Deactivate the Disaster Housing Strategy</li> </ol>

## Phase 1 – Immediate Response and Initial Damage Assessment

This phase focuses on the initial period immediately following a disaster. Activities focus on addressing the initial needs of impacted communities and conducting an initial damage assessment. Each of the key activities for this phase are outlined further below.

**It is important to note that these activities may not always follow a clear sequential order and will vary based on each specific incident.** There are many activities that will have overlapping timelines.

### Activity 1: Activate the Disaster Housing Working Group

Triggers for activating this Disaster Housing Strategy are outlined in **Disaster Housing Strategy Activation Triggers**. The Lead Facilitator, the Commerce Housing Division, will then coordinate with Disaster and Emergency Services to activate other relevant members of the Disaster Housing Working Group, both Core and Incident-Specific Members, based on the specific scope and complexity of the emergency. Please see **Disaster Housing Working Group** for more information on these member organizations.

### Activity 2: Conduct Recovery Needs and Housing Impact Assessment

Next, developing a baseline housing inventory and impact assessment would help the state determine the extent of disaster impacts to housing and help to identify key objectives for recovery. It is a critical step to maintaining a current understanding of both the physical state of housing stock and the economics of the housing market. A reduction in available housing stock will cause a spike in housing costs. The inability to find affordable housing may be the single greatest contributor to residents leaving their communities following a disaster.

During this step, the Montana Disaster Housing Working Group, in coordination with other state partners, could evaluate current housing stock and associated risk exposure by mapping and modeling the vulnerability of Montana's existing housing, considering location, age, construction type and other risk factors. This will inform pre-disaster planning activities advanced under associated Emergency Support Functions and

Recovery Support Functions and anticipate disaster impacts to the State of Montana's housing stock. Please see **Emergency Support Functions and Recovery Support Functions** for additional information.

A housing survey tool(s) could be developed in advance of a disaster to collect information from residents and neighborhood organizations. Survey and other instruments can be administered through or in coordination with other Emergency Support Functions. The federal Housing Recovery Support function, led by the U.S. Department of Housing and Urban Development, can also offer housing impact assessment services. Furthermore, the Federal Emergency Management Agency's Interagency Recovery Coordination Team, if activated, will be conducting a similar assessment. This could provide some integration efforts between federal and state partners. Establishing relationships, including data sharing agreements, with utility providers, community-based organizations and private sector partners will also facilitate baseline housing inventory gathering and information sharing. Activities that could assist with this information or resource sharing include:

- Work with government finance and grant experts to explore funding options (rules, limits, opportunities).
- Work with housing developers and trade associations to mobilize labor for reconstruction and rehabilitation activities.
- Work with large employers to facilitate the provision of housing and related needs for their employees.
- Work with community-based and volunteer organizations such as Habitat for Humanity.
- Work with manufacturing and wholesale trade organizations to provide equipment and materials for recovery and rebuilding.

While analyzing standard reports can be useful for identifying the potential need for direct temporary housing assistance, contacting survivors affected by the disaster is

necessary to determine (with confidence) that direct temporary housing assistance is required. The need to gather this critical information must be balanced with the need to manage expectations regarding temporary housing units. The Federal Emergency Management Agency, through its National Processing Service Centers, conducts needs assessments to gain more accurate information to help determine whether direct temporary housing assistance is needed.

The housing needs assessment can consist of interviews with a representative sample of disaster survivors meeting the standard criteria to gain more information about their ability to access adequate, alternate housing. Essentially, the needs assessment interview is an abbreviated form of a Pre-Placement Interview where referrals to housing resources are made, but temporary housing units are not offered or otherwise discussed. The focus on vulnerable populations necessitates a partnership and reliance upon social service and health care providers who are in direct contact with this population.

### **Activity 3: Activate Emergency Sheltering Resources**

Emergency Sheltering takes place during and immediately following a disaster event that results in evacuations or displacement. Shelters are typically open for no longer than 15 days after an incident. In the State of Montana, the American Red Cross and other agencies that aid in emergency response on a tribal/local/state/federal level manage shelter operations, which is done in coordination with local and state emergency management and other community organizations. It is important to note that Emergency Sheltering is addressed by Emergency Support Function #6 (Mass Care, Emergency Assistance and Human Services). It is important to identify the limitations and strengths of agencies that can participate in immediate sheltering operations. Many agencies typically play multiple roles during a disaster. Knowing how to best deploy scarce resources will ensure adequate support for disaster survivors. The size and scope of a disaster will also determine how agencies will respond. This includes when

and whether shelters can be opened and of what capacity. Once determinations have been made, agencies will deploy in their given capacity. Additional information on providing sheltering for catastrophic events is included in **Appendix 5: Sheltering for Catastrophic Events** and **Appendix 6: Sheltering Identification**.

<b>Overview</b>	<ul style="list-style-type: none"> <li>• Takes place during and immediately following a disaster event that results in evacuations or displacement</li> <li>• Shelters are typically open for no longer than 15 days after a disaster</li> </ul>
<b>Priorities</b>	<ul style="list-style-type: none"> <li>• Immediate sheltering of disaster victims (e.g., emergency shelters, group sites, rental assistance, other support services)</li> <li>• Assistance for shelters to accommodate those with access and functional needs</li> <li>• Assistance for service animals and household pets (bigger category, livestock)</li> </ul>
<b>Relevant Stakeholders</b>	<ul style="list-style-type: none"> <li>• Local and tribal emergency managers</li> <li>• Housing Resources Development Center</li> <li>• American Red Cross</li> <li>• National Shelter System</li> <li>• Local coordinated entry systems</li> <li>• Humane societies (lead for disaster pet sheltering)</li> <li>• Salvation Army</li> <li>• Montana Voluntary Organizations Active in Disaster</li> <li>• Food bank</li> <li>• Faith-based organizations</li> <li>• Community-based organizations</li> </ul>
<b>Roles and Responsibilities</b>	<ul style="list-style-type: none"> <li>• Aid in emergency response to manage shelter operations</li> <li>• Sheltering animals (lead is the local level)</li> <li>• Assessing for access and functional needs</li> </ul>
<b>Other Considerations</b>	<ul style="list-style-type: none"> <li>• Falls at the discretion of the local level</li> <li>• Multi-Agency Resource Center coordination with local agencies</li> <li>• Need to determine what programs are immediately available and under what conditions</li> </ul>

## Activity 4: Implement Temporary Housing Assistance

As a complement to emergency sheltering, the State of Montana may also consider deploying emergency rental assistance programs and identifying vacant rental properties to house displaced individuals. This would require the state to rapidly establish financial assistance mechanisms to help affected households access those rental properties, hotel accommodations, or other interim housing solutions.

To assist in identifying potential rental resources, a variety of web-based private companies maintain databases of available housing resource information that can be leveraged. This information is also often collected and shared with the Federal Emergency Management Agency. The Federal Emergency Management Agency and will generally defer to housing data provided by the state but will also gather available housing information from the U.S. Department of Housing and Urban Development, the U.S. Department of Agriculture and private vendors. The Disaster Housing Working Group should coordinate at the state-level to identify housing resources that are viable for the Federal Emergency Management Agency to acquire and repair for the purpose of providing temporary housing.

Additional considerations include:

- Rental resources are generally analyzed by three primary characteristics: 1) number of bedrooms, 2) cost compared to the U.S. Department of Housing and Urban Development Fair Market Rent and 3) proximity to the affected area.

---

<sup>1</sup> Under the Americans with Disabilities Act, a service animal is defined as a dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability. Comparatively, an assistance animal is an animal that works, provides assistance, or performs tasks for the benefit of a person with a disability, or that provides emotional support that alleviates one or more identified effects of a person's disability. An assistance animal is not a pet but can be any animal.

These data points are typically examined on a jurisdictional basis, county-by-county as appropriate. The Montana Disaster Housing Working Group's analysis shall take into consideration resources in adjacent counties, declared or undeclared.

- MTHousingSearch.com (<https://mthousingsearch.com/>) is a tool that can be leveraged after a disaster to identify potential available rental units. While this tool may not be all encompassing, it does provide a feature to filter for available units with specific accessibility parameters.
- The Montana Disaster Housing Working Group's analysis will measure the number of additional housing resources that may be made available by increasing financial temporary housing assistance up to 125% of the U.S. Department of Housing and Urban Development Fair Market Rent. This information shall be gathered by using the "Available by Bedroom and Fair Market Rent" report in the U.S. Department of Housing and Urban Development's Housing Portal.
- The Montana Disaster Housing Working Group should coordinate as needed to ensure rental resource information is available to the Federal Emergency Management Agency's geospatial intelligence sharing platform (<https://gis-fema.hub.arcgis.com/>). This information will be used to develop county and community level mapping products, which visually identify the geographic distribution of available rental resources.

## **Host State Support**

When households are displaced by a natural or human-caused disaster and have their own means of transportation, they may travel to neighboring communities or beyond Montana state boundaries. When survivors arrive in neighboring states, they may seek "host state support". Additionally, neighboring states may be asked by the federal government or by the affected state to shelter and feed survivors. Neighboring states

may also be asked by the federal government or by the State of Montana to shelter survivors. Local resources can be augmented through the assistance of voluntary organizations (e.g., Emergency Management Assistance Compact, Federal Emergency Management Agency).

The Evacuee Support Planning Guide is a planning resource for states and jurisdictions that may receive a substantial number of evacuees from another state, or from within their own state after a disaster. The Federal Emergency Management Agency has published guidance for states and jurisdictions to have a comprehensive guide to planning for large evacuee support operations. The Evacuee Support Function Planning Guide

([https://www.fema.gov/pdf/emergency/disasterhousing/evacuee\\_support\\_guide.pdf](https://www.fema.gov/pdf/emergency/disasterhousing/evacuee_support_guide.pdf)) and Evacuee Support Concept of Operations template are standalone documents that can be used for assistance

([https://www.fema.gov/pdf/emergency/disasterhousing/evacuee\\_support\\_conops\\_template.pdf](https://www.fema.gov/pdf/emergency/disasterhousing/evacuee_support_conops_template.pdf)). The guide and template can be used to augment an existing plan or to assist states in developing their own Evacuee Support Concept of Operations to supplement their state Emergency Operations Plan. The template is designed to be a ready-made base template and provides generic text, which each state can tailor to their needs and planning assumptions. These documents work in partnership to provide a comprehensive collection of best practices, tools, suggested actions and processes for states and jurisdictions.

### Activity 5: Engage Stakeholders

It is essential to initiate immediate communication with federal, state, local and tribal agencies, as well as other non-profit organizations and private-sector partners. These partners can be engaged through established communication channels, in addition to regular situation briefings, as appropriate, to ensure coordination of response efforts and resource allocation.

## **Coordination With State-Level Partners**

State departments and agencies are responsible, within their statutory authorities, for aiding local and tribal jurisdictions when local capabilities are overwhelmed by a disaster. The State Emergency Coordination Center serves as the principal point for coordinating state, local, tribal and federal resources, such as the delivery of emergency assistance to affected jurisdiction(s).

The State Emergency Coordination Center will coordinate with the primary agency and support agencies in the use of state resources to support Emergency Support Function #6 and Recovery Support Function #4 during response and recovery activities. State resources will supplement, not supplant, local resources. When activated to respond to an incident, the primary agency and support agencies will develop work priorities in cooperation with local and tribal governments and in coordination with the State Emergency Coordination Center.

If the Governor of the State of Montana has declared an emergency, resources may be requested through the Emergency Management Assistance Compact, the nation's state-to-state mutual aid system, that is processed through the State Emergency Coordination Center. The State of Montana Disaster Housing Working Group, coordinated by Montana Disaster and Emergency Services and the Department of Commerce Housing Division, serves primarily as a pre-disaster planning and post-disaster evaluation body focused on the range of housing support needed to assist survivors.

## **Coordination with Local and Tribal Government Partners**

Local and tribal area governments are primarily responsible for mass care, emergency assistance, temporary housing and human services within their jurisdiction along with the following:

- Completing damage assessments;
- Developing debris management strategies;

- Supporting mass care activities;
- Providing behavioral health services to survivors;
- Developing disaster housing strategies;
- Managing donations and volunteers; and,
- Facilitating the sharing of resources to support response activities.

Local and tribal authorities are responsible for obtaining required waivers and clearances related to Emergency Support Function #6 support and are responsible for requesting state assistance through the jurisdiction's emergency management agency when an incident exceeds local capabilities.

Responsibility for situation assessment and determination of resource needs are ascertained primarily through the local and tribal incident management system.

Shortages of resources are adjudicated at the lowest jurisdictional level. Local and tribal law enforcement offices coordinate with the local or on-site Incident Commander within the disaster area to determine evacuation areas, roadblocks and access control points.

After a disaster, local and tribal elected leadership has the authority to appoint individuals to lead recovery efforts, in addition to adopting a post-disaster recovery plan.

Elected officials should advocate for their communities and can draft and support initiatives to aid their community's recovery, especially as it relates to housing needs.

Examples include enacting housing-specific or utility moratoria, waiving permits or permit fees and temporarily permitting non-traditional housing options in locations which would, under normal circumstances, be prohibited. Local and tribal emergency or disaster proclamations or declarations are usually prepared by the local or tribal emergency manager and implemented by the executive head of the political subdivision or tribal government. This process in turn often triggers specific local, state and/or federal assistance programs and procedures.

## **Coordination with Community Stakeholders**

### **Private Sector/Non-Governmental Organizations**

Most disaster relief to individuals and families is provided by non-governmental organizations, principally the volunteer, nonprofit, community-based and faith-based organizations in the State of Montana that have a response and recovery mission. These organizations are independent of formalized emergency response operations, although they could be affiliated with Montana Voluntary Organizations Active in Disaster. State emergency preparedness planners and responders often encourage these organizations to participate and collaborate in planning, training and exercise activities. Some organizations with existing agreements with the state have been assigned supporting roles in the Montana Emergency Response Framework, Montana Disaster Recovery Framework and the Montana Disaster Housing Strategy. Resources from non-governmental organizations and the private sector may augment local response capabilities. Non-governmental organizations, together with academia and the private sector, are integral elements of response and recovery in coordinating with local, tribal, state and federal partners to provide Emergency Support Function #6 resources, programs and services to affected individuals/households and communities. These partners collaborate to resolve the disaster related unmet needs of affected individuals and communities.

Non-governmental organizations and the private sector also provide operational information to local, tribal, state and federal agencies. This information allows Emergency Support Function #6 planners to identify actual or potential shortfalls and/or excesses and adjust services to the needs of the community. The American Red Cross is a non-governmental organization that provides disaster relief to individuals and families and is responsible for providing emergency congregate and individual care in coordination with local government and private agencies. The American Red Cross receives its mission from a congressional charter and is mandated by Federal Law 36-United States Code-3001 and reaffirmed in Public Law 93-288

(Stafford Act). The American Red Cross supports the following related to disaster housing:

- Initiate mass care services within the affected area upon notification of the emergency or disaster.
- Assist government agencies in the management and coordination of sheltering, feeding, emergency first aid services and bulk distribution of emergency supplies to the affected population.
- Coordinate relief efforts with Montana Voluntary Organizations Active in Disaster, the Montana Governor's Office of Community Service and other non-governmental organizations as appropriate.
- Provide a representative to the State Emergency Coordination Center to facilitate coordination of mass care services.
- Support mass care services with facilities, vehicles, supplies, personnel and other provisions as available.

Montana Voluntary Organizations Active in Disaster consists of non-governmental, faith-based organizations with a disaster related mission. Montana Voluntary Organizations Active in Disaster agencies specific to long-term housing needs include:

- **Montana Southern Baptist Convention:** Supports muck out and mold remediation.
- **World Renew Disaster Response Services:** Supports needs assessment for repair of homes.
- **American Red Cross:** Assists with disaster casework and damage verification.

Volunteer, faith- and community-based and other non-governmental organizations in the civic or nonprofit sector are integral to local community responses to disasters.

American Red Cross, the Salvation Army and other member agencies of the Montana

Voluntary Organizations Active in Disaster will support Emergency Support Function #6 activities through the provision of immediate shelter, feeding and emergency first aid relief to individuals and families, which are not normally available from government resources. These local organizations will work in cooperation with the local government within their jurisdiction in preparing for, responding to and recovering from the effects of an emergency or disaster event.

The private sector specifically plays a critical role in supporting disaster recovery efforts because the private sector owns or operates a large proportion of the resources that would be needed for rapid restoration of the infrastructure that supports housing. The private sector contributes substantially by providing much-needed donations or providing goods and services through contractual arrangement or government purchases to assist in recovery. The private sector also supports recovery activities through advisory and supportive roles.

Additional examples of private and non-governmental partners that could be leveraged after a disaster include, but are not limited to:

- **NeighborWorks Montana:** Supports affordable housing solutions and financial assistance.
- **Habitat for Humanity:** Provides homebuilding assistance and recovery support.
- **Catholic Social Services of Montana:** May provide emergency housing assistance.
- **Mennonite Disaster Service:** May offer volunteer rebuilding services after disasters.
- **Lutheran Disaster Response:** Supports long-term housing recovery.
- **Samaritan's Purse:** Helps with home reconstruction and emergency housing solutions.
- **Montana Community Foundation:** Offers disaster relief funding for housing recovery.

- **Dennis and Phyllis Washington Foundation:** Provides grants for community recovery efforts.
- **Team Rubicon:** Deploys veteran-led volunteer teams to assist with debris removal, home repair and rebuilding efforts.
- **The Mission Continues:** Mobilizes veterans to assist in disaster recovery and rebuilding efforts.
- **National Voluntary Organizations Active in Disaster:** Coordinates national-level non-governmental organizations involved in housing recovery, including faith-based and nonprofit partners.
- **The Red Lodge Area Community Foundation:** May provide Disaster Case Management assistance in addition to providing resources to the local community.

While technically a federal government entity, the **U.S. Army Corps of Engineers** may also be engaged to support emergency infrastructure repair, temporary housing support (such as the installation of Federal Emergency Management Agency trailers) and debris removal.

### Colleges and Universities

Colleges and universities can play a critical role in supporting housing operations after a disaster through providing resources, leveraging expertise and supporting community networks to aid overall recovery. These institutions often collaborate with government agencies, non-profits and local communities to address housing challenges following disasters (e.g., research projects, housing studies). Contributions generally from the academic environment can include providing temporary shelter for displaced residents in campus facilities, conducting research to inform sustainable housing solutions and training students in fields like architecture, engineering and social work to assist in rebuilding efforts. Specifically for the State of Montana, the Office of the Commissioner of Higher Education oversees all state colleges and universities and will lead

coordination efforts with these institutions. The Office of the Commissioner of Higher Education is the central administrative unit of the Montana University System as well as the Board of Regents.

### Activity 6: Support Public Communication and Outreach

Based on the activities supported during this phase, in addition to all subsequent phases, it is essential to launch an information campaign to inform the public about available housing resources, application processes for support and any other safety measures. The State of Montana could consider using multiple communication channels, including state websites, social media and emergency alert systems, as well as in-person assistance centers, to convey essential information.

## Phase 2 – Short-Term Housing Solutions

This phase focuses on securing and implementing short-term housing solutions to support impacted communities in the initial weeks to months following a disaster. **It is important to note that these activities may not always follow a clear sequential order and will vary based on each specific incident.** There are many activities that will have overlapping timelines.

### Activity 1: Support Transitional Housing/Sheltering Efforts

Transitional housing is needed to help relocate survivors from impacted areas for an extended period of time to ensure their safety. Similar to temporary housing assistance outlined in Phase 1, this includes identifying and deploying additional interim housing solutions, such as hotels, rental assistance programs and temporary housing units. The State of Montana will likely need to rely on federal, state, local, non-governmental organizations and private sector partners in support of this activity. Using these

partnerships, the state should consider establishing agreements with property owners, landlords and other housing providers to secure additional housing capacity.

These housing operations range from congregate/transitional shelters to permanent housing solutions. Due to the variance in housing, assistance can range from several weeks up to 18 months or even longer depending on the size and scope of the event, and whether the President declares a major disaster. The Disaster Housing Working Group’s role is to provide advisory support to local and tribal housing authorities, to assist in the evaluation of potential solutions to secure accommodation for displaced populations and, when requested, and as resources are available, provide short-term rental assistance to eligible households.

Additional information on providing sheltering for catastrophic events is included in **Appendix 5: Sheltering for Catastrophic Events** and **Appendix 6: Sheltering Identification**.

<b>Overview</b>	<ul style="list-style-type: none"> <li>• Takes place between the closure of emergency shelters and when displaced populations can return to permanent housing</li> <li>• Assistance can range from weeks to 18 months or longer depending on the size/scope of the event, and whether the President declares a major disaster</li> </ul>
<b>Priorities</b>	<ul style="list-style-type: none"> <li>• Provide housing solutions ranging from congregate or transient shelters to permanent housing solutions</li> <li>• Identify pre-disaster leasing/housing options</li> </ul>
<b>Relevant Stakeholders</b>	<ul style="list-style-type: none"> <li>• Montana Realtors Association</li> <li>• Department of Commerce, Housing Division</li> <li>• RV Rental Locations</li> </ul>
<b>Roles and Responsibilities</b>	<ul style="list-style-type: none"> <li>• Provide potential housing solutions to secure accommodation for displaced populations</li> <li>• Provide short-term rental assistance to eligible households</li> </ul>
<b>Other Considerations</b>	<ul style="list-style-type: none"> <li>• If a major disaster is declared and Federal Emergency Management Agency Individual Assistance is available, the duration of assistance may exceed the initial two months</li> </ul>

- If rental housing stock is limited, other options may be considered as a matter of last resort (e.g., mobile homes, college dormitories, military barracks, etc.)

## Activity 2: Support Disaster Case Management

Disaster case managers rely on housing agencies to help locate rental resources for disaster survivors. Housing providers can also more effectively address housing needs through a coordinated case management process. Disaster Case Management services are usually provided by more than one agency, so information about housing programs and resources will need to be communicated to case managers representing voluntary agencies, faith-based entities and government organizations.

For the State of Montana, Disaster and Emergency Services has a role in establishing and coordinating Disaster Case Management for the state. Disaster and Emergency Services may leverage requests for proposals and/or contracts with various entities that will carry out Disaster Case Management activities. Montana Voluntary Organizations Active in Disaster may also support Disaster Case Management for the state through managing a comprehensive list of agencies who support various aspects of Disaster Case Management. When there is a need for Disaster Case Management, Disaster and Emergency Services should coordinate with Montana Voluntary Organizations Active in Disaster and other organizations, as appropriate. The capacity to provide Disaster Case Management services depends on a number of factors, including disaster scope, surge capacity of volunteers and auxiliary personnel, ability to access national-level resources, availability of funds and whether the area has been approved by the Federal Emergency Management Agency for Individual Assistance.

### Activity 3: Facilitate Federal and State Assistance Programs and Expand State and Local Housing Programs

During this period, the State of Montana, in collaboration with local and tribal emergency management, should also consider working to assist residents of impacted communities in applying for appropriate federal assistance programs, such as Federal Emergency Management Agency Individual Assistance, U.S. Small Business Administration loans and other state or federal relief programs (see **Appendix 1: Planning, Preparedness and Funding Opportunities** for additional information). This can include providing information and resources on state webpages to direct residents where to receive more information and/or submit applications. This process also ties into relevant Disaster Case Management needs.

At the state and local level, the State of Montana may also consider identifying potential resources for and, where feasible and practicable, implementing state-funded rental assistance and housing repair grant programs to supplement federal aid. The state could develop initiatives such as workforce housing projects to support displaced workers and first responders. It is important to note that these types of programs can only be implemented to the extent that funding and resources permit.

From a funding perspective, it is also important to note that there is a typical order of funding. This guidance establishes the order in which disaster relief agencies and organizations provide assistance to disaster survivors. This is intended to prevent duplication of benefits, maximize available resources and coordinate efforts to help disaster survivors navigate the recovery process. The order of initial funding includes:

1. Federal Emergency Management Agency, Emergency Assistance - Voluntary Organizations Active in Disaster
2. Private Insurance Carriers
3. Federal Emergency Management Agency, Housing Assistance

4. Federal Emergency Management Agency, Other Needs Assistance - Not Income Based
5. U.S. Small Business Administration Disaster Loans
6. Federal Emergency Management Agency, Other Needs Assistance - Income Based
7. Federal Emergency Management Agency, Unmet Needs – Montana Voluntary Organizations Active in Disaster
8. Community Development Block Grant Disaster Recovery - if appropriated by Congress

Please note this list above is not exhaustive, but rather, it includes the initial funding programs that are likely to be leveraged after a disaster, which typically follow a similar sequential order.

Finally, it is important to note that for larger, more substantial disasters, the State of Montana may establish a Disaster Recovery Center, which is a central hub to support impacted communities. Staffed by representatives from federal, state and local agencies, such as Voluntary Organizations Active in Disaster and non-governmental representatives, these centers serve as a one-stop-shop for individuals and families to access information, apply for assistance and connect with recovery programs and services tailored to their needs.

#### **Activity 4: Monitor and Address Displacement Issues**

Throughout this phase, it is essential for the State of Montana to consider tracking housing displacement trends to ensure vulnerable populations receive equal access to housing resources. This could include developing strategies to prevent long-term homelessness or unnecessary institutionalization in addition to ensuring stable housing for low-income families, seniors and individuals with access or functional needs.

## Activity 5: Develop Infrastructure for Temporary Housing

During this phase, the State of Montana may also want to consider deploying modular housing, manufactured homes, or other community-based transitional housing sites to provide stable, short-term accommodations while planning begins for longer-term recovery efforts. It is essential to ensure that these sites are equipped with essential services such as utilities, healthcare and community resources.

## Phase 3 – Intermediate Recovery and Reconstruction

### Planning

This phase focuses on supporting intermediate housing recovery efforts and beginning to plan for longer-term housing needs, such as reconstruction planning. **It is important to note that these activities may not always follow a clear sequential order and will vary based on each specific incident.** There are many activities that will have overlapping timelines.

### Activity 1: Develop Housing Recovery Plans

By this phase, it is important for the State of Montana to have a clear understanding of unmet housing needs. As such, the state should consider working with local jurisdictions to create and fund rebuilding strategies that incorporate resilient and sustainable housing practices. Through these practices, the state could establish clear goals for restoring housing stock, prioritizing underserved communities and ensuring disaster-resistant construction. Formation of these programs will likely occur in this phase as these housing recovery plans and programs will need to be developed once disaster-specific unmet needs of the community are identified.

### Activity 2: Streamline Permitting and Zoning Adjustments

Given the need to provide impacted communities with stable and secure housing as quickly as possible, the state could consider working to expedite approvals for

reconstruction and temporary housing installations by coordinating with local permitting offices. The state may also consider emergency waivers or fast-track permitting processes to reduce delays in rebuilding efforts. The state is also encouraged to work with community members/partners to determine what changes need to be made so that rebuilding efforts end in accessible results, for improved community cohesion but also to ensure American with Disabilities Act compliance. Some activities that the state may wish to consider related to streamlining permitting and zoning adjustments include:

- **Pre-approve modular housing types:** Local jurisdictions can coordinate to pre-approve specific modular housing designs to accelerate placement and reduce approval times.
- **Create a shared building plan repository:** Establish a repository of pre-approved building plans to reduce costs for residents and streamline the permitting process.
- **Coordinate staffing for permitting and inspections:** Address anticipated staffing shortages by planning for surge capacity in permitting and inspection functions.
- **Implement regional labor-sharing agreements:** Facilitate agreements among neighboring jurisdictions to share permitting and inspection personnel, helping to manage high demand and reduce processing delays.

The above represents only a sample of potential activities; specific adjustments and their feasibility will ultimately vary based on the disaster, resources available, funding and other regulatory requirements. Different types of activities may also be managed at the local vs the state vs the federal level. In instances in which federal funding is available, additional funding and resources may become available. As an example, the Federal Emergency Management Agency's Public Assistance Program and Policy Guide Version 5, Category I, includes additional information on building code and floodplain management

administration and enforcement. This resource provides specific parameters related to flood plain permits.

### **Activity 3: Identify Additional Funding Sources**

During this phase, the state may consider coordinating with federal, state and private-sector partners to identify additional funding streams (e.g., Community Development Block Grant Disaster Recovery, Hazard Mitigation Grant Program) that could be leveraged to support communities at this point following a disaster. The state may also consider establishing public-private partnerships to maximize financial resources for housing recovery. An additional federal resource that may be available is the Federal Emergency Management Agency's Interagency Recovery Coordination Team, which can assist the state and/or local leaders in identifying funding mechanisms and coordinating with the appropriate agencies that would help with managing these funding streams.

### **Activity 4: Support Homeowner and Rental Assistance Programs**

While the specific housing programs made available to impacted communities will vary based on the scale and complexity of the disaster, the state could consider providing financial and logistical support for home repairs, rental rehabilitation and housing affordability initiatives. The state may also want to implement direct repair programs for low-income households and develop incentives for landlords to rebuild and maintain affordable rental properties. This is also especially critical for promoting accessibility and disaster resilience.

### **Activity 5: Enhance Workforce and Construction Capacity**

Depending on the scale of the disaster, the state may also need to address labor shortages and supply chain issues. In particular, there may be a need for skilled/certified professionals such as urban planners, permit technicians and building inspectors who can support various housing recovery programs. One avenue to support

this is by developing and/or supporting workforce training programs for construction and skilled trades. This could be achieved by partnering with colleges and universities, trade schools, or other apprenticeship programs to increase the local workforce capacity for housing recovery efforts.

### Activity 6: Coordinate Buyout and Relocation Programs

For impacted communities that may be in high-risk areas, the state may seek to establish voluntary buyout programs and facilitate relocation assistance for residents who choose to move to safer locations. It is important to ensure that these programs are equitable and provide adequate compensation for affected households.

## Phase 4 – Long-Term Housing Recovery and Resilience

### Building

This phase focuses on securing and implementing long-term housing solutions and supporting planning for future resiliency building efforts. **It is important to note that these activities may not always follow a clear sequential order and will vary based on each specific incident.** There are many activities that will have overlapping timelines.

### Activity 1: Facilitate Permanent Reconstruction Efforts

By this phase in housing recovery efforts, there may be a focus on permanent reconstruction efforts. For those initiatives, the state may consider overseeing rebuilding projects to ensure compliance with updated building codes, mitigation strategies and resilience standards. The state may also seek to promote the use of hazard-resistant materials and sustainable design principles.

Permanent Housing is defined as a long-lasting housing option. A permanent renter is one who may live in a rental home or apartment and that may be determined to be their

“permanent” housing option. Other applicants may own a home, condo, or mobile unit and that be determined.

The primary responsibility for securing permanent housing is on the individual homeowners, multifamily property owners, local communities and private entities such as insurance companies. However, the Commerce Housing Division, the administratively attached Montana Board of Housing, Department of Housing and Urban Development and other social service organizations play instrumental roles in helping local communities make decisions regarding long-term recovery and rebuilding, as well as assisting disaster survivors find permanent housing and recover from disasters.

This comes through the application of existing programs in disaster affected communities. This could include, but is not limited to, the following:

- Community education related to issues such as insurance (including hazard/flood insurance), foreclosure, purchasing new homes, building codes and land use practices;
- Financial assistance to local and tribal public housing agencies, businesses, homeowners and renters; and,
- Technical assistance to local public and tribal housing agencies.

<b>Overview</b>	<ul style="list-style-type: none"> <li>• Entails helping local communities make decisions regarding long-term recovery and rebuilding as well as assisting disaster survivors find permanent housing</li> </ul>
<b>Priorities</b>	<ul style="list-style-type: none"> <li>• Move disaster victims to permanent housing as quickly as possible</li> <li>• Identify funding sources/partners that are available (timelines, requirements) and socialize with the public</li> </ul>
<b>Relevant Stakeholders</b>	<ul style="list-style-type: none"> <li>• Montana Board of Housing and Commerce Housing Division</li> <li>• Department of Housing and Urban Development</li> <li>• Private housing companies</li> <li>• Federal Emergency Management Agency/U.S. Small Business Administration (permanent repair program)</li> </ul>

	<ul style="list-style-type: none"> <li>• Governor’s Housing Task Force</li> </ul>
<b>Roles and Responsibilities</b>	<ul style="list-style-type: none"> <li>• Provide community education on issues related to insurance, foreclosure, purchasing new homes and building codes and land use practices</li> <li>• Provide financial and technical assistance to local and tribal housing</li> </ul>
<b>Other Considerations</b>	<ul style="list-style-type: none"> <li>• The primary responsibility for securing permanent housing is on the individual homeowners, multifamily property owners, local communities and private entities</li> <li>• Coordination with the private sector for development (modular companies of interest for partnerships)</li> </ul>

## Activity 2: Enhance Building Codes and Land-Use Policies

During construction projects, the state should consider advocating for improved construction standards, zoning laws and floodplain management regulations that help to reduce future disaster risks. Through its programs, the state could encourage the adoption of resilient housing designs to withstand future hazards.

## Activity 3: Develop Affordable and Sustainable Housing Initiatives and Preparedness Programs

For longer-term efforts, there is an opportunity for the state to work with developers, nonprofits and public agencies to create permanent, accessible and affordable housing stock that meets long-term community needs. It is important to consider promoting mixed-income and multi-family developments that incorporate energy-efficient, disaster-resistant and inclusive features.

The state may also wish to consider expanding efforts to educate homeowners, builders and policymakers on risk reduction and accessibility strategies. Offering incentives for property owners to retrofit existing homes and implementing flood-resistant and wind-resistant measures are some examples of a sustainable housing preparedness approach.

## Activity 4: Monitor Progress and Adapt Strategies

Considering that long-term housing initiatives may extend for a few years it is essential to implement long-term tracking and reporting mechanisms to measure housing recovery outcomes. The state should consider conducting periodic reviews of existing housing programs and updating policies to incorporate lessons learned and best practices for future disasters.

## Activity 5: Deactivate the Disaster Housing Strategy

Triggers for deactivating this Disaster Housing Strategy are outlined in **Disaster Housing Strategy Deactivation Triggers**. The Lead Facilitator, the Commerce Housing Division, will lead this process and provide the appropriate notifications to relevant stakeholders.

## Establishing Resource Sharing Agreements

Across all phases, establishing Memorandums of Understanding or Statements of Understanding are a key tool for enhancing disaster response capabilities. They serve as agreements that outline roles, responsibilities and coordination mechanisms between the State of Montana and other states or organizations to ensure a more effective and efficient response to disasters. Key benefits of Memorandum of Understandings or Statement of Understandings can include, but are not limited to:

- **Improve coordination** by establishing clear lines of communication, clear roles and responsibilities, and a unified approach to managing disasters.
- Provide a framework for **resource mobilization**, which can help to secure additional personnel, equipment and expert resources if the State of Montana's capacity to respond to a disaster has been exceeded.
- **Expedite response times** through establishing pre-determined protocols and procedures, which will allow for a more rapid deployment of resources.

- **Reduce administrative hurdles** by streamlining administrative processes and allowing partners to focus on the immediate needs of affected populations.
- **Promote best practice sharing** by allowing partners to share knowledge and best practices during a disaster. This collaborative learning can help support continuous improvement in disaster preparedness and response strategies.

It is recommended that, when feasible, Memorandum of Understandings or Statement of Understandings be developed in advance of a disaster so that they can be activated quickly. If pre-existing Memorandum of Understandings or Statement of Understandings are not feasible, there are a few resources that can assist the State of Montana in developing them post-disaster to coordinate the provision of essential resources.

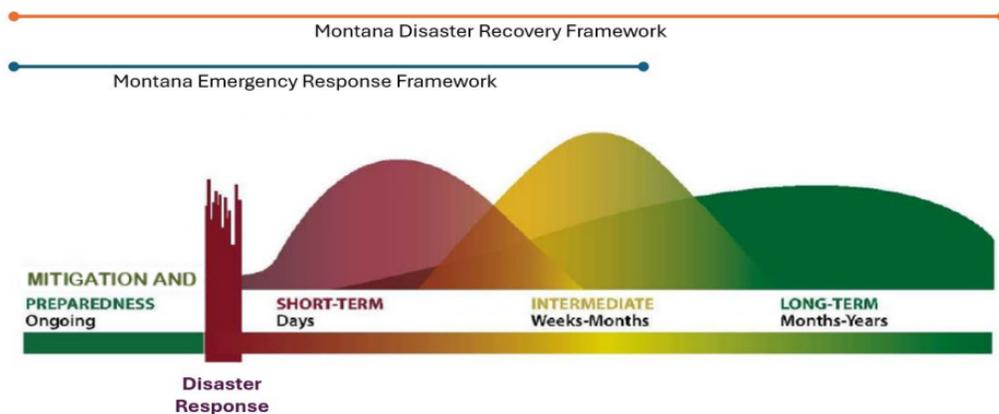
- **Federal Emergency Management Agency, Disaster-Specific Memorandum of Understanding Tool:** Provides a guide for preparing for and writing Disaster-Specific Memorandums of Understanding. While specific to coordinating environmental and historical preservation reviews during disaster recovery, it still outlines essential elements of information to consider and document for any disaster Memorandum of Understanding. This tool is available here: [https://www.fema.gov/sites/default/files/2020-06/Disaster-Specific\\_MOU.pdf](https://www.fema.gov/sites/default/files/2020-06/Disaster-Specific_MOU.pdf).
- **Department of Homeland Security “Writing Guide for a Memorandum of Understanding”:** Provides guidance for developing a Memorandum of Understanding to include recommendations for the structure, questions to consider and sample language. This tool is available here: <https://www.npstc.org/resourceCD/Writing%20Guide%20for%20MOUs.pdf>.
- **Oregon Department of Justice “Guidelines for Memorandums of Understanding”:** Provides a sample Memorandum of Understanding format and content for organizations that require a formal agreement for grant applications, which is available here: [https://www.doj.state.or.us/wp-content/uploads/2017/08/mou\\_sample\\_guidelines.pdf](https://www.doj.state.or.us/wp-content/uploads/2017/08/mou_sample_guidelines.pdf).

- **Center for Disease Control and Prevention – Sample Memorandum of Understanding Template:** Includes a template Memorandum of Understanding. While this is specific to the U.S. Centers for Disease Control and Prevention, it includes example information that may be included in a Memorandum of Understanding. This is available here:  
<https://www.cdc.gov/ophdst/media/pdfs/2024/06/MUboilerplate0907.pdf>.
- **Memorandum of Understanding Example #1:** Includes a sample Memorandum of Understanding titled, “Memorandum of Understanding Establishing the Unified Federal Environmental and Historic Preservation Review Process for Disaster Recovery Projects”. This sample Memorandum of Understanding is available here: [https://www.fema.gov/sites/default/files/2020-06/Signed\\_UFR\\_MOU\\_9\\_24\\_14.PDF](https://www.fema.gov/sites/default/files/2020-06/Signed_UFR_MOU_9_24_14.PDF).
- **Memorandum of Understanding Example #2:** Includes a sample Memorandum of Understanding between the U.S. Department of Homeland Security/Federal Emergency Management Agency and the U.S. Environmental Protection Agency, which is available here:  
[https://www.fema.gov/sites/default/files/2020-07/fema\\_mou\\_fema-epa\\_2016.pdf](https://www.fema.gov/sites/default/files/2020-07/fema_mou_fema-epa_2016.pdf).

# Transition Between Disaster Phases

## Disaster Phases

The Concept of Operations section outlines the key activities that could occur in the period immediately following a disaster to years following a disaster. It is important to note that these activities will fall along a continuum of disaster phases. The figure below includes the recovery continuum for the State of Montana. This Disaster Housing Strategy can be leveraged to support pre-disaster planning but is primarily designed to be used post-disaster to inform short-term, immediate and long-term housing recovery operations.



An overview of each of these phases are as follows:

- **Mitigation and Preparedness:** Implement policies, infrastructure improvements and community education to reduce disaster risks and enhance resilience.
- **Response:** Activate emergency shelters, conduct damage assessments and provide immediate housing assistance to displaced individuals.
- **Short-Term Recovery:** Transition survivors to interim housing, facilitate access to financial aid and stabilize communities through temporary housing solutions.
- **Intermediate Recovery:** Develop housing recovery plans, streamline rebuilding processes and secure funding to restore permanent housing options.

- **Long-Term Recovery:** Oversee reconstruction, strengthen building codes, invest in affordable housing and enhance community resilience for future disasters.

## Mitigation and Preparedness

Key activities and priorities that can occur during this phase include:

- Develop and enforce building codes, zoning regulations and land-use policies.
- Conduct risk assessments and invest in infrastructure improvements.
- Educate communities on disaster risks and resilience strategies.
- Establish partnerships and pre-disaster agreements for housing support.
- Pre-position resources and plan for rapid housing response.
- Develop plans and strategies for use before, during and after a disaster.

## Response

Key activities and priorities that can occur during this phase include:

- Activate emergency housing task forces and sheltering operations.
- Conduct rapid damage assessments to determine housing needs.
- Deploy temporary shelters and provide emergency rental assistance.
- Coordinate federal, state and local resources for immediate relief.
- Communicate critical information to the public about assistance programs.

## Short-Term Recovery

Key activities and priorities that can occur during this phase include:

- Transition displaced residents to interim housing solutions (e.g., hotels, rentals).
- Support residents in applying for Federal Emergency Management Agency aid and other financial assistance.

- Consider implementation of eviction moratoriums or other housing stability protections.
- Establish case management services to assist affected individuals.
- Begin infrastructure repairs for temporary and transitional housing.

## Intermediate Recovery

Key activities and priorities that can occur during this phase include:

- Develop comprehensive housing recovery plans with local governments.
- Streamline permitting and zoning processes for reconstruction.
- Secure funding from federal grants and private-sector partnerships.
- Establish and/or expand rental and home repair assistance programs.
- Launch workforce development initiatives for rebuilding efforts.

## Long-Term Recovery

Key activities and priorities that can occur during this phase include:

- Oversee permanent housing reconstruction and community redevelopment.
- Strengthen building codes and land-use policies for future resilience.
- Invest in affordable housing and sustainable development initiatives.
- Monitor recovery progress and adjust strategies based on lessons learned.
- Support long-term economic and social resilience programs.

## Transition Criteria

The transition between the disaster phases noted above are often marked by various operational, logistical and situational criteria. It is important to note that these transitions are not always clearly defined and will vary by each disaster and by each community. Generally, disaster response priorities focus on lifesaving and life-sustaining operations

and stabilizing fundamental services in a community (e.g., safety and security, energy, health and medical). Once immediate threats to life and property have been addressed, recovery can begin with the focus shifting to assessing and addressing longer-term recovery needs. The table below provides some general criteria to consider:

	Response	Short-Term Recovery	Intermediate Recovery	Long-Term Recovery	Return to Normal/New Normal
<b>Key Priorities</b>	<ul style="list-style-type: none"> <li>• Save lives</li> <li>• Stabilize incident</li> <li>• Protect property</li> </ul>	<ul style="list-style-type: none"> <li>• Stabilize community</li> <li>• Address immediate needs</li> </ul>	<ul style="list-style-type: none"> <li>• Rebuild core community services</li> <li>• Economic and housing recovery</li> </ul>	<ul style="list-style-type: none"> <li>• Sustainable rebuilding</li> <li>• Risk reduction</li> <li>• Community revitalization</li> </ul>	<ul style="list-style-type: none"> <li>• Stabilize community</li> <li>• Implement improvements</li> </ul>
<b>Transition Criteria</b>	<ul style="list-style-type: none"> <li>• Life-threatening conditions are addressed</li> <li>• Hazard(s) contained</li> <li>• Initial damage assessments are complete</li> </ul>	<ul style="list-style-type: none"> <li>• Essential services partially restored</li> <li>• Temporary housing in place</li> <li>• Short-term funding secured</li> <li>• Community access resumed</li> </ul>	<ul style="list-style-type: none"> <li>• Permanent housing begins</li> <li>• Long-term funding secured</li> <li>• Repairs are underway</li> <li>• Recovery governance established</li> </ul>	<ul style="list-style-type: none"> <li>• Displaced populations resettled</li> <li>• Projects are completed</li> <li>• Governance transitions to normal</li> <li>• Community is fully functional</li> </ul>	<ul style="list-style-type: none"> <li>• Recovery structures demobilized</li> <li>• Systems are fully functional</li> <li>• Community is operating at or above pre-disaster levels</li> </ul>

## Sequence of Delivery

In building from the disaster phases, there is also a sequence of delivery for providing post-disaster support to impacted communities. This sequence of delivery includes four periods that span from pre-disaster preparedness to long-term recovery:

- The first period includes programs/resources that can be utilized to strengthen the capacity to mitigate damage from future disasters.
- The second period, which extends from the disaster to one-to-two months post-disaster, illustrates state and federal emergency programs that can be activated in the immediate aftermath of a disaster.
- The third period is defined by the three- to-18-month period following the disaster (interim stage) and is the beginning of recovery.
- Finally, the last period, 18 months and beyond, includes long-term programs that communities can use to recover from disasters.

The timelines in the sections that follow illustrate the resources as a part of the Sequence of Delivery.

## State-Level Sequence of Delivery

The state Sequence of Delivery programs are activated when local resources are exhausted. The graphic below provides an overview of this sequence. The Disaster Housing Working Group will coordinate/collaborate and work in tandem with the organizations identified in the graphic below to support both pre- and post-disaster housing recovery activities. **Please note that the organizations listed in the graphic below do not represent the full exhaustive list of partners who would be involved; rather, the core/main state-level organizations who are also referenced in this Strategy.**

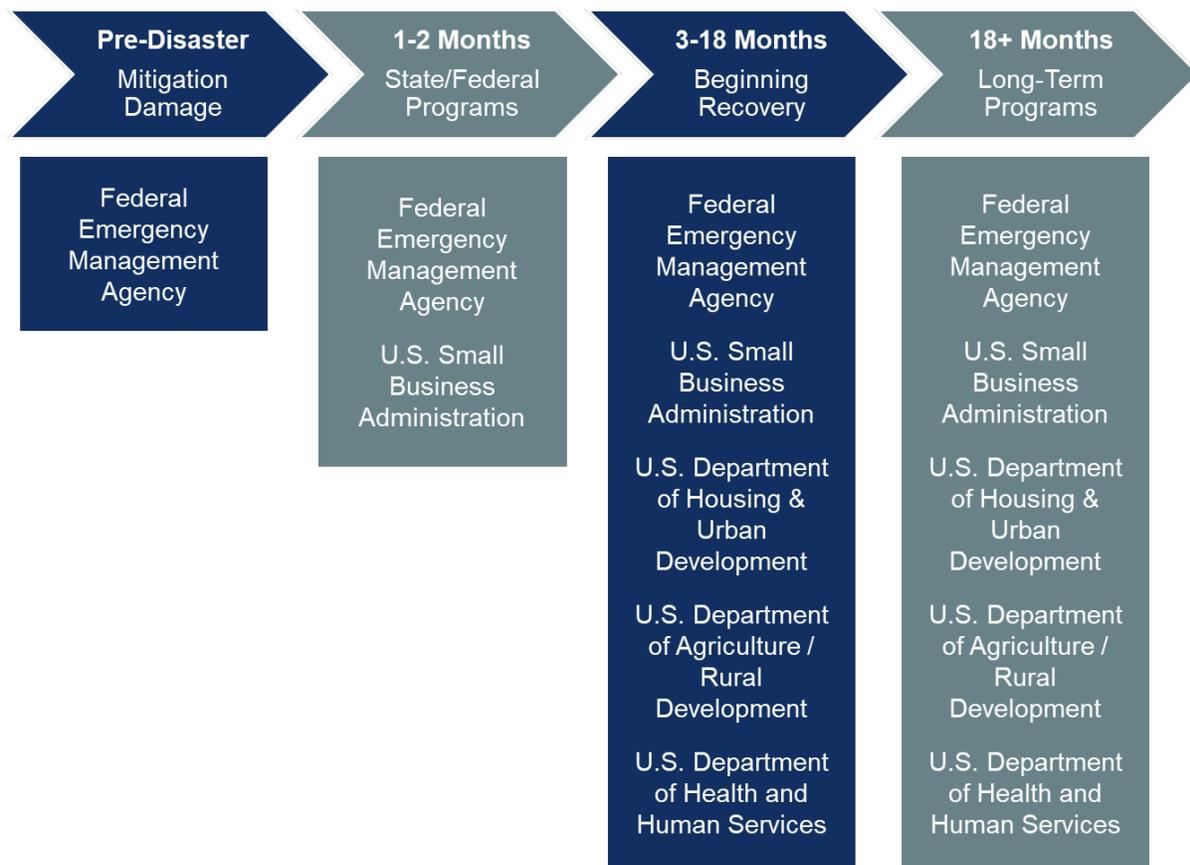


# COMMERCE



## Federal-Level Sequence of Delivery

The Federal Sequence of Delivery programs are activated when local/state resources are exhausted. The graphic below provides an overview of this sequence. **Please note that the organizations listed in the graphic below do not represent the full exhaustive list of partners who would be involved; rather, the core/main federal-level organizations who are also referenced in this Strategy.**



## Emergency Support Functions and Recovery Support Functions

An **Emergency Support Function** is a coordinated response mechanism that brings together state, federal and local agencies, along with private-sector and nonprofit partners, to provide critical resources and services during disaster response operations.

In housing recovery, Emergency Support Function #6 (Mass Care, Emergency Assistance and Human Services) plays a key role in sheltering, temporary housing and immediate assistance to displaced individuals. Montana’s Emergency Support Function framework is “used to organize resources and capabilities through identification and coordination of primary support agencies based on authorities and availability of resources in a given functional area.” “These Emergency Support Functions provide the structure for coordinating state interagency support for a state response to an incident.”

**A Recovery Support Function** focuses on long-term recovery efforts by coordinating resources, policies and technical assistance to rebuild communities sustainably and equitably. The Housing Recovery Support Function for the State of Montana is responsible for organizing principles for effective recovery support. They are organized to correspond to federal Recovery Support Functions and are used to facilitate and accelerate communication, whole community coordination and the delivery of resources.

Both Emergency Support Functions and Recovery Support Functions are structures that may be stood up to support overall response and recovery operations. After a disaster, there may be shared and overlapping responsibilities between these entities. As such, it is essential for the state to actively manage the transition between Emergency Support Functions and Recovery Support Functions across different phases of the disaster cycle to ensure continuity of operations, avoid duplication of efforts and facilitate a smooth progression from response to recovery. Additionally, it is important to note the relationship between Emergency Support Functions, Recovery Support Functions and the Disaster Housing Working Group. The figure below details the state’s Emergency Support Function and Recovery Support Function Crosswalk that can be used to assist with this transition and coordination of potential overlapping activities.

During interim and long-term recovery, state government partners are responsible for coordinating the transition from Emergency Support Functions to Recovery Support Functions for incidents that have a longer duration and that are focused on more

specialized tasks requiring technical expertise (e.g., economic redevelopment, environmental rehabilitation and housing development). Specifically, the State Emergency Coordination Center will mobilize Recovery Support Functions as soon as it becomes apparent that intermediate and/or long-term recovery will require special coordination among agencies.

During disaster response and short-term recovery, the state’s response is organized by Emergency Support

Emergency Support Functions (ESFs)	Community Planning and Capacity Building	Economic Recovery	Health and Social Services	Housing	Infrastructure Systems	Natural and Cultural Resources
ESF 1 – Transportation		X			X	
ESF 2 – Communications		X			X	
ESF 3 – Public Works and Engineering		X			X	
ESF 4 – Firefighting						X
ESF 5 – Information and Planning	X	X	X	X	X	X
ESF 6 – Mass Care, Emergency Assistance, and Human Services			X	X		
ESF 7 – Logistics	X					
ESF 8 – Public Health and Medical Services			X			
ESF 9 – Search and Rescue	-None-					
ESF 10 – Oil and Hazardous Materials Response						X
ESF 11 – Agriculture and Natural Resources		X			X	X
ESF 12 – Energy		X			X	
ESF 13 – Public Safety and Security						
ESF 14 – Private Sector and Critical Infrastructure		X			X	
ESF 15 – External Affairs	X	X	X	X	X	X
ESF 16 – Cybersecurity					X	

Functions, as described in the Montana Emergency Support Framework. The transition of recovery actions from Emergency Support Functions to Recovery Support Functions is coordinated by the State Emergency Coordination Center. During transition, there may be an overlap where both an Emergency Support Function and the associated Recovery Support Functions are active. The level of Recovery Support Function engagement depends on the demands of incident and the requirements for each Recovery Support Function. During this time, Montana Disaster and Emergency Services will serve as the coordinating agency between the state’s Recovery Support Functions.

As it specifically relates to disaster housing operations after an incident, Recovery Support Function #4 Housing coordinates state agency program delivery and technical assistance to local and tribal jurisdictions. Many state agencies, departments and organizations manage programs that can be prioritized for, or applied to, disaster

recovery scenarios. Once activated, the Housing Recovery Support Function can become an information and program clearing house for federal, state and local resources and needs. Recovery Support Function #4 addresses pre- and post-disaster housing issues and coordinates and facilitates the delivery of state resources to assist local and tribal governments in helping their residents in the recovery, repair and replacement of their homes in a decent, safe, sanitary, timely and resilient.

Additional information on Recovery Support Function #4 is documented in **Appendix 3: Recovery Support Function 4 (Housing) Overview**.

For the State of Montana, Montana Disaster and Emergency Services is the entity that formally leads response and recovery efforts and who is responsible for activating key response and recovery structures, such as Emergency Support Functions and Recovery Support Functions. Each of these entities have formally documented roles and responsibilities in the Montana Emergency Response Framework and Montana Disaster Recovery Framework and support actual boots-on-the ground operations after a disaster. How this differs from the Disaster Housing Working Group is that this group is more of a working/advisory group that is activated after a disaster that has an impact on housing and thus requires additional coordination efforts to assist impacted communities. This group is facilitated by the Commerce Housing Division and operates more as a “think tank”, providing advisory services to formal entities such as Emergency Support Functions and Recovery Support Functions as it specifically relates to housing needs. Additional information on the Disaster Housing Working Group is documented in the **Disaster Housing Working Group** section of this Strategy.

# Appendix 1: Planning, Preparedness and Funding Opportunities

## Investing in Affordable and Resilient Housing

The lack of affordable housing, in addition to the impact on individuals and the economy, hinders the community's ability to offer housing options in the event of a disaster as well as long-term recovery efforts. The first step is to invest in affordable and resilient housing during periods when a crisis is not impending. The State of Montana can do this through several strategies utilizing federal funding and existing housing programs. Examples include, but are not limited to:

- **Use of Public Funds and Municipal Resources:** Examples include Tax Increment Financing Districts, Payment in Lieu of Taxes programs, bridge loans, property acquisitions, etc.
- **Use of External Funds:** Leveraging available sources of funding and funding models for affordable housing, such as Low-Income Housing Tax Credits, Opportunity Zone financings, Community Land Trusts, Deed restricted homeownership, etc.
- **Land Use and Entitlement Properties:** Using land use policies to promote the development and preservation of affordable housing such as Accessory Dwelling Units, density bonuses, reduced parking requirements, Brownfields, etc.
- **Development of Public Property:** Using publicly owned land and buildings for affordable housing development such as adaptive reuse of public buildings, co-locating housing with public uses, land banking, redevelopment of public land, etc.
- **Coordination with Private-Sector:** The vast majority of new housing is constructed by private investors in response to perceived demand in various

market sectors. For-sale and rental housing for those population sectors below 80% of average median income most often requires subsidies to reduce costs and provide a rate of return equal to what investors receive for housing at or above market-rate, (~120% Average Median Income). The public sector can play an important role in incentivizing the construction of affordable or below market-rate housing. Reducing financial risk, land and or construction costs, minimizing delays in permitting and allowing for greater density, are examples of actions in which government entities at the federal, state and local level have cooperated with private investors to increase the supply of affordable housing.

The U.S. Department of Housing and Urban Development offers many programs and financing options that the State of Montana already utilizes to develop affordable housing. These programs include:

- **HOME Investment Partnerships Program:** Congress created the HOME Program to provide participating jurisdictions, both state and local, with flexible funding, specifically to meet the affordable housing needs of low-income renters and homebuyers/homeowners.
  - Eligible activities include costs associated with housing acquisition, new construction and rehabilitation as well as tenant-based rental assistance.
  - HOME Homeowner Rehabilitation: HOME funds may be used to assist existing homeowners with repair, rehabilitation, or reconstruction of owner-occupied units. This must be done according to the participating jurisdiction's written rehabilitation standard. It is important to note however, that the State of Montana Department of Commerce is not currently leveraging this program. HOME regulation requires homes be brought entirely up to code, the cost of which often exceeds the after-rehabilitation value of the home.

- **HOME Community Housing Development Organization:** The HOME Community Housing Development Organization is a private nonprofit, community-based organization that has staff with capacity to develop affordable housing for the community it serves. At least 15% of HOME funds must be set aside for specific activities to be undertaken by the HOME Community Housing Development Organization.
- **HOME Consortia:** Forming a consortium allows local governments who would not otherwise qualify for funding to join with other contiguous units of local government to directly participate in the HOME Investment Partnership Program.
- **National Housing Trust Fund:** The Housing Trust Fund Program provides grants to states to develop and preserve affordable housing— primarily rental housing for extremely low-income households.
  - Eligible activities include housing acquisition, new construction and rehabilitation, along with operating subsidies to ensure the long-term financial stability of assisted projects. Used to produce or preserve affordable housing through new construction, reconstruction or rehabilitation of non-luxury housing; states are eligible grantees and must use 80% of funds for rental housing.
- **Community Development Block Grant:** The Community Development Block Grant Program provides funding to states, cities and counties to develop viable urban communities by creating decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.
  - Eligible renter and homeowner housing-related activities include acquisition of real property, clearance/demolition, infrastructure, rental or homeowner rehabilitation and in limited circumstances, new housing construction.

- There are multiple types of Community Development Block Grant funds which can be used during steady state and disaster recovery:
  - Community Development Block Grant Entitlement Program: Provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.
  - Section 108 Loan Guarantee: The Section 108 Program enables Community Development Block Grant grantees to leverage their annual grant allocation to access low-cost, adaptable financing for community and economic development-related projects. Eligible housing-related activities include housing rehabilitation, acquisition, site preparation, and, under limited circumstances, new affordable housing construction. It is important to note however, that the State of Montana Department of Commerce is not currently leveraging this program.
- **Community Development Block Grant Disaster Recovery**: Provides additional funding in response to extraordinary impacts from disasters. Not all Presidentially-Declared Disasters will receive Community Development Block Grant Disaster Recovery funds. Congress may appropriate funds to the U.S. Department of Housing and Urban Development when there are significant unmet needs for long-term recovery, and the U.S. Department of Housing and Urban Development allocates funds based on unmet recovery needs. These funds may be used for disaster relief, long-term recovery, restoration of infrastructure, housing and economic revitalization. Note the threshold to meet minimum requirements is difficult to achieve in Montana's sparsely populated areas.

Third-party sources of funding are also available to help develop affordable housing:

- **Federal Home Loan Banks' Affordable Housing Program:** The Affordable Housing Program is a competitive funding program for the production and preservation of affordable housing (both rental and homeownership) funded by the government sponsored Federal Home Loan Banks system.
- **Historic Tax Credits:** Administered by the National Park Service and the Internal Revenue Service, Historic Tax Credits provide capital funds for developers undertaking a substantial rehabilitation of a historic asset. Historic Tax Credits can be used in the rehabilitation of historic residential buildings or the adaptive reuse of other historic structures.
- **Housing Finance Agency Risk-Sharing - Section 542:** Administered by approved Housing Finance Agencies, the program provides low-cost capital to spur the development of rental housing through risk sharing arrangements between the U.S. Department of Housing and Urban Development and Housing Finance Agencies. This assists agencies by providing more insurance and credit for multifamily loans. It is important to note that the Montana Board of Housing has done previous Housing Finance Agency Risk-Sharing work, but they are not presently engaged in this program.
- **Investment Tax Credits and Other Energy Efficiency Funding:** Investment Tax Credits are commonly referred to as “solar tax credits” because they may be used to cover a portion of the costs of installing solar arrays. Investment Tax Credits and other funding mechanisms, such as utility rebates, energy performance contracts and Property Assessed Clean Energy programs, can be used as part of the funding stack for housing projects that commit to certain levels of energy efficiency and renewable energy generation.
- **Low Income Housing Tax Credits:** These are allocated by the Montana Board of Housing to private developers for the production or preservation of low-income

housing. They can take the form of competitive 9% Low Income Housing Tax Credit awards or non-competitive 4% awards, which can be paired with state tax-exempt bond proceeds. Montana Board of Housing currently requires that developers use the Montana Board of Housing as a state issuer per the state's qualified action plan. It does not permit local issue of tax-exempt bonds if other funding is available through Montana Board of Housing.

- **New Markets Tax Credits:** Local organizations called Community Development Entities apply for New Markets Tax Credits from the MoFi Community Development Financial Institutions Fund, in Missoula, and invest the proceeds into public interest projects (including affordable housing construction) in qualified low-income communities.
- **Opportunity Zones:** Created in 2017, Opportunity Zones offers a tax incentive for people and corporations to invest in distressed communities across the country. Please see <https://commerce.mt.gov/Infrastructure-Planning/Resources/Opportunity-Zones/> for additional information.
- **Tax-Exempt Bonds:** These are typically issued by state or local government agencies and, as mentioned above, are often in conjunction with an award of non-competitive 4% Low Income Housing Tax Credits. Tax-exempt housing bonds function like loans that are contracted by governments and passed along to developers but with one important difference: with tax-exempt housing bonds, the investor who purchases the loan is exempt from income taxes on the interest earned from that loan. These favorable terms are passed on from the borrower (government agency that issued the bonds) to the developer, resulting in a low-cost housing project loan.

There are additional creative financial mechanisms and affordable housing models managed by private organizations throughout Montana, which may be considered (note

that the State of Montana does not currently administer or finance the program types listed below):

- Community Land Trusts (Commerce provides HOME funds to land trust organizations to invest in construction or provide homebuyer assistance for land trust homes)
- Deed-Restricted Homeownership (Commerce also awards HOME funds to organizations that provide downpayment and closing cost assistance that are secured with deed restrictions to either recapture the HOME funds at transfer of property or to ensure the subsequent resale of the property to an income-eligible homebuyer)
- Employer-Assisted Housing
- Limited Equity Cooperatives
- Tenant Opportunity to Purchase Act
- Medicaid Waivers and other supportive services funding
- Social Impact Bonds

## **Promoting Fair and Equitable Housing**

The State of Montana’s 2024 Fair Housing Equity Plan serves to assess the state’s fair housing issues and underlying causes, as well as establishing fair housing goals. This plan specifically outlines strategies for achieving equal access to housing resources.

While this document is not specific to housing needs resulting from a specific emergency, it does include recommendations for how to overcome patterns of segregation and discrimination with regards to housing, which can often be exacerbated after a disaster. This plan is accessible here: <https://commerce.mt.gov/Housing/Fair-Housing>.

## **State Funding Opportunities**

## Community Technical Assistance Program

**Overview:** The Community Technical Assistance Program provides professional planning assistance to communities across the State of Montana in support of sound land use and development decisions, economic revitalization and overall community resilience. Technical assistance is provided through workshops and trainings; direct assistance by phone or email; collaboration with local, state and federal partners; as well as the creation of model documents and guidance on planning best practices.

**Purpose:** The purpose/mission of Community Technical Assistance Program is to provide technical assistance to encourage planning and sustainable development in Montana communities by working with local governments, planning departments, private developers, non-profit organizations and the public. The Community Technical Assistance Program assists communities statewide through research and by providing both technical and legal guidance, education and training.

**Services:** Community Technical Assistance Program staff work with local governments and the public on long-range planning issues and assist in the development and adoption process of land use plans and regulations. The Community Technical Assistance Program also provides legal guidance and professional insight on planning topics such as subdivision regulations, zoning and annexations. They assist developers, surveyors, engineers and planners to interpret statute and understand case law governing land use planning. Staff review plans and regulations to ensure compliance with statute, programmatic requirements and to encourage professional best practices, while also conducting research regarding local or statewide land use planning issues or questions. More information can be found on this program through the online contact form: <https://commerce.mt.gov/Infrastructure-Planning/Programs-and-Services/Community-Technical-Assistance/>.

## Montana Coal Endowment Program

**Overview:** The Montana Coal Endowment Program is a state-funded program designed to help address the affordability of local infrastructure projects by providing grants to lower the cost of constructing public facilities.

**Purpose/Services:** The purpose of Montana Coal Endowment Program is to provide funding for infrastructure projects (e.g., eroding water lines, limited wastewater treatment plant capacity) to assist local governments in maintaining critical infrastructure that is vital for communities. More information can be found on this program here: <https://commerce.mt.gov/Infrastructure-Planning/Programs-and-Services/Montana-Coal-Endowment-Program/Emergency-Grants>.

## Federal Funding Opportunities

### Federal Emergency Management Agency Individual Assistance Program

Housing impacts are primarily addressed through the Federal Emergency Management Agency's Individual Assistance Program. When a Presidential declaration authorizes the Individual Assistance Program assistance, affected individuals and businesses can apply for assistance. The Individuals and Households Program under Individual Assistance provides a grant and services to disaster survivors when losses are not covered by their insurance and property has been damaged or destroyed. Individuals and Households Program grants may be used for interim housing, home repairs (to make the home safe, sanitary and functional), home replacement or other needs. Education and awareness is done at the local emergency managers level, however, when disaster Individual Assistance is received from the Federal Emergency

Management Agency, the state will provide information to local emergency managers and housing authorities through relevant communication channels (e.g., state websites).

### **Small Business Administration Disaster Loan Program**

Low-interest disaster loans from the U.S. Small Business Administration may also be available to cover residential and business losses not fully compensated by insurance. The U.S. Small Business Administration can make federally subsidized loans for the following purposes: 1) home disaster loans to homeowners to repair or replace homes and to replace personal property, 2) physical disaster loans to repair or replace disaster-damaged property, including inventory and supplies and 3) economic injury disaster loans to provide capital to small businesses that suffered losses due to the disaster but did not experience physical damages.

For many individuals, the U.S. Small Business Administration disaster loan program is the primary form of disaster assistance. Montana Disaster and Emergency Services is the lead state agency for administering federal disaster assistance programs. Montana Disaster and Emergency Services will assign staff to support delivery of each of the major programs (Federal Emergency Management Agency Public Assistance, Federal Emergency Management Agency Individual Assistance, Federal Emergency Management Agency Hazard Mitigation, U.S. Small Business Administration Disaster Loans) and will maintain their role as an ongoing liaison with federal agencies involved in recovery efforts.

## Appendix 2: Training and Education

### Federal Training and Education

To effectively help people before, during and after disasters, response and recovery partners should pursue training and education opportunities relevant to their area of support. Several national entities offer training on the topic of disaster housing.

#### Federal Emergency Management Agency

The Federal Emergency Management Agency provides training and education for the nation's first responders, emergency managers and whole community partners through a variety of institutes, consortium partners and platforms. Search for training topics through the National Preparedness Course Catalog:

<https://www.firstrespondertraining.gov/frts/npcc>.

#### National Disaster and Emergency Management University (formerly the Emergency Management Institute)

The Federal Emergency Management Agency offers numerous courses and opportunities for professional development through the National Disaster and Emergency Management University. Independent Study courses are self-paced and can be completed at any time. More advance training and professional series are also available throughout the year. Courses are offered virtually, on the Emmitsburg campus, or at local sites throughout the nation. View the curriculum here:

<https://training.fema.gov/ndemu/curriculum/>.

#### Department of Housing and Urban Development

The U.S., Department of Housing and Urban Development Exchange also provides training opportunities to help develop skills, build knowledge and expand capacity to implement various U.S. Department of Housing and Urban Development programs.

Offerings include live trainings, on-demand trainings, webinars and conferences. More information is available here: <https://www.hudexchange.info/trainings/>.

## American Red Cross

Education on disaster sheltering as well as other disaster preparedness training can be requested and obtained by the American Red Cross here:

<https://www.redcross.org/take-a-class/disaster-training>.

## Montana Training and Education

The State of Montana oversees its own training and education requirements. Training and education can be found in the State of Montana's Disaster and Emergency Services State Training Program. An overview on what is available related to training and education can be found on pages six through eight of the State Training Program located here: <https://des.mt.gov/Preparedness/Training-and-Exercise>. Training recording is also kept at the state level and the State Training Plan includes additional information on this process. Additional information and specific contact information for training-related inquiries is available here: <https://des.mt.gov/Preparedness/Training-and-Exercise>.

## Appendix 3: Recovery Support Function 4 (Housing) Overview

The Housing Recovery Support Function #4 is discussed in more detail in the table below. Please note this information is specific to Recovery Support Function #4. For additional information on Emergency Support Functions and the Disaster Housing Working Group, please see **Emergency Support Functions and Recovery Support Functions**.

**Purpose:** Describes how the State of Montana addresses pre- and post-disaster housing issues and coordinates the delivery of state resources and activities to assist local and tribal governments as they rehabilitate and reconstruct destroyed and damaged housing, when feasible, and develop new accessible, permanent housing option.

**Scope:** The core recovery capability for housing is the ability to implement housing solutions that effectively support the needs of the whole community and contribute to its sustainability and resilience. Local economies cannot recover from devastating disasters without adequate housing, especially affordable housing. It is challenging because many years' worth of housing repair, rehabilitation, reconstruction and new construction often need to occur at an accelerated pace as a result of a disaster. These conditions create design, construction, labor, materials, logistics, inspection and financing issues. Recovery Support Function #4, through its primary and supporting and agencies, works toward addressing disaster housing issues pre-disaster, focusing on solutions that are implementable, sustainable and resilient. Recovery Support Function #4 coordinates and effectively integrates available housing-related resources, addresses conflicting policy and program issues, and identifies gaps in service and assistance delivery. Recovery Support Function #4 involves intermediate and long-term housing for people displaced by a disaster, with a goal of long-term solutions in their own communities.

- **Transitional Housing:** is needed to remove survivors from the disaster site for an extended period of time to ensure their safety.
- **Temporary/Interim Housing:** is defined by the length of stay. 30 days up to two years is a general timeframe for temporary housing. Apartments, condos and rental homes are common housing options.

- **Permanent Housing:** is defined as a long-lasting housing option. A permanent renter is one who may live in a rental home or apartment and that may be determined to be their “permanent” housing option. Other applicants may own a home, condo, or mobile unit.

*Note: Emergency Sheltering, which is the immediate housing option for survivors following a disaster to ensure a safe and sanitary environment, is addressed by Emergency Support Function #6 in the Montana Emergency Response Framework.*

Recovery Support Function #4 is designed to provide guidance to state departments in aiding local and tribal partners in addressing housing of individuals and families impacted from disasters. The following are potential activities included within the scope of Recovery Support Function #4 are (this list is comprehensive but not all-inclusive):

- Identify strategies and options that address a broad range of disaster housing issues, such as those dealing with planning, zoning, design, production, logistics, codes and financing.
- Build accessibility, resiliency, sustainability and mitigation measures into identified housing recovery strategies.
- Facilitate coordination between state, local and tribal governments, as well as relevant private sector and non-profit organizations.
- Coordinate the transition to disaster housing recovery activities from response support activities.
- Coordinate and leverage state and federal resources to assist local and tribal governments in addressing housing-related recovery needs.
- Encourage rapid and appropriate decisions regarding land use and housing locations in the recovering communities or regions.
- Support or provide technical assistance for housing assessments and emergency needs (e.g., emergency permitting for needed repairs, damage assessments of private homes).
- Identify gaps and coordinate resolution of issues involving conflicting policies and programs.
- Promote communication and information-sharing throughout the recovery process between all involved partners.
- Support local jurisdictions in rehousing the impacted individuals and families as quickly and safely as possible so that people can remain in the area. This will be completed by coordinating and delivering applicable agency programs and technical assistance.
- Implement mitigation actions, as part of the recovery process, when possible, to reduce future risk.



# COMMERCE

- Convene necessary state resources, achieving broad representation on the Recovery Support Function to establish situational awareness, obtain a common operating picture and provide efficient service delivery.
- Support the development of a local long-term recovery organization through technical assistance, best-practice identification and continued agency liaison involvement.

State Coordinating Agency		State Primary Agency	
Disaster and Emergency Services		Department of Commerce	
State Supporting Agencies			
<ul style="list-style-type: none"> <li>• Department of Administration</li> <li>• Department of Environmental Quality</li> <li>• Department of Labor and Industry</li> <li>• Department of Public Health and Human Services</li> </ul>		<ul style="list-style-type: none"> <li>• Department of Transportation</li> <li>• Montana Commissioner of Securities and Insurance</li> <li>• Montana Secretary of State</li> <li>• Montana University System</li> <li>• Department of Military Affairs</li> </ul>	
Core Capability		Key Activities	
		The State Emergency Coordinating Center coordinates with the primary agency and supporting agencies to coordinate resources/activities during actual or potential incidents:	
<b>Housing</b>	<b>Pre-Disaster</b>		
	<ul style="list-style-type: none"> <li>• Works with federal, local and tribal governments, organizations and others.</li> <li>• Identifies strategies and options that address a broad range of disaster housing issues such as those dealing with planning, zoning, design, production, logistics, codes and financing.</li> <li>• Builds accessibility, resilience, sustainability and mitigation measures into identified housing recovery strategies.</li> </ul>		
	<b>Post Disaster</b>		

- When activated by the State Emergency Coordination Center, the primary and supporting departments and agencies deploy in support of the Housing Recovery Support Function mission.
- Coordinates and leverages state housing-related resources to assist local and tribal governments to address housing-related disaster recovery needs.
- Encourages rapid and appropriate decisions regarding land use and housing location in the community or region.
- Identifies gaps and coordinates a resolution of conflicting policy and program issues.
- Maintains robust and accessible communications throughout the recovery process between the state government and all other partners to ensure ongoing dialogue and information sharing.

#### Target Outcomes

Departments and agencies with expertise in long-term housing solutions work through this Recovery Support Function so that:

- Housing resources that address local and tribal disaster recovery housing needs are coordinated.
- Planning for current and post-disaster requirements are integrated into the organizations at the local and state level that perform land and community planning and building code administration.
- Local, state, tribal and federal programs, industry and construction options for addressing post disaster housing needs are in place.
- Research results related to the disaster recovery housing area are shared.
- Interagency knowledge and expertise are shared with state-led housing task forces to address disaster housing issues.
- Pre- and post-disaster interaction and problem solving among federal agencies and stakeholders with a focus on reconstructing permanent housing, including affordable and accessible housing that incorporates resilience, sustainability and mitigation concepts are facilitated.
- Timely construction of housing that complies with local, state and national model building codes, including accessibility standards, is facilitated.

- Loss of historic buildings and resources is minimized.

# Appendix 4: Disaster Housing Working Group Roles and Responsibilities

## Disaster Housing Working Group Core Member Roles and Responsibilities

The tables below detail roles and responsibilities for **Disaster Housing Working Group Core Members**.

*Please note that the roles and responsibilities outlined in the table represent a sample of key functions for each organization. Actual duties may vary based on the specific nature of an emergency, the operational environment and the evolving needs of response and recovery efforts. Additional responsibilities may be assigned as necessary to ensure an effective and coordinated approach to incident management.*

### State Organizations

Organization	Pre-Disaster Duties	Post-Disaster Duties
<b>Montana Department of Commerce: Housing Division</b>	<ul style="list-style-type: none"> <li>Lead the Disaster Housing Working Group</li> <li>Lead development and maintenance of the Disaster Housing Strategy</li> <li>Develop interim strategies for supporting local efforts to provide housing to displaced residents, including those in subsidized housing</li> </ul>	<ul style="list-style-type: none"> <li>Serve in a primary communications capacity with the Community MT Division</li> <li>Coordinate the deployment of resources</li> <li>Provide technical assistance for local and tribal housing authorities on programs to support housing needs</li> <li>Coordinate with federal partners to identify and secure resources to assist disaster survivors</li> </ul>



# COMMERCE

Organization	Pre-Disaster Duties	Post-Disaster Duties
	<ul style="list-style-type: none"> <li>Administers non-emergency funding for infrastructure and water/wastewater projects for low-and moderate-income communities and households through the Community Development Block Grant Program</li> </ul>	<ul style="list-style-type: none"> <li>Coordinate and manage resources provided by volunteer and community-based organizations</li> <li>Handle the distribution of emergency rental assistance that is issued as a result of disaster declaration</li> </ul>
<b>Montana Department of Commerce: Community MT Division</b>	<ul style="list-style-type: none"> <li>Provide technical assistance and manage community grant programs</li> <li>Support disaster mitigation planning and housing infrastructure</li> <li>Support pre-disaster housing planning</li> <li>Assist with facilitating or enabling planning efforts to identify local government redevelopment or disaster recovery priorities and needs</li> <li>Provide professional planning assistance to communities across Montana in support of sound land use and development decisions,</li> </ul>	<ul style="list-style-type: none"> <li>Provide technical assistance through grant programs</li> <li>Administer emergency funding for infrastructure and water/wastewater infrastructure projects (Montana Coal Endowment Program)</li> <li>Can administer new federal or state disaster money/funding/grants to local governments for a rebuilding program in the case of an extraordinary state or community disaster and with ‘special’ Presidential/Gubernatorial declarations and ‘special’ congressional/legislative authorizations</li> <li>Administers the Community Development Block Grant Program used for community planning activities, housing, public and community facilities and economic</li> </ul>

Organization	Pre-Disaster Duties	Post-Disaster Duties
	<p>economic revitalization and overall community resilience through Community Technical Assistance Program</p> <ul style="list-style-type: none"> <li>Develop Montana’s Resilience Framework, which provides a step-by-step process for communities to identify, assess and adapt to social, economic and ecological disruptions</li> </ul>	<p>development, which is intended to benefit low to moderate income Montanans</p> <ul style="list-style-type: none"> <li>Administers the Montana Community Reinvestment Plan Act Planning Grant Program, which provides planning grants to local and tribal governments for planning and zoning reforms to increase housing supply</li> </ul>
<p><b>Montana Disaster and Emergency Services: Mitigation and Recovery Bureau</b></p>	<ul style="list-style-type: none"> <li>Support development and maintenance of the Disaster Housing Strategy</li> <li>Manage the State Emergency Coordination Center</li> <li>Facilitate planning/updates on a regular cadence for housing-related activities</li> <li>Maintain the State of Montana’s Emergency Operations Plan</li> <li>Coordinate planning, development and maintenance of Emergency and Recovery Support Functions</li> </ul>	<ul style="list-style-type: none"> <li>Activate the State Emergency Coordination Center and associated Emergency Support Functions/Recovery Support Functions, which provide a central coordination hub for response and recovery efforts</li> <li>Coordinate delivery of Emergency Support Function and Recovery Support Function services related to mass care, emergency assistance, interim housing and human services</li> <li>Provide equipment and personnel for life saving response operations in alignment with Emergency Support Functions</li> <li>Activate and deploy personnel to fill State Emergency Coordination</li> </ul>



# COMMERCE

Organization	Pre-Disaster Duties	Post-Disaster Duties
	<ul style="list-style-type: none"> <li>• Coordinate with local, state, tribal and non-governmental partners in support of mass care planning</li> </ul>	<ul style="list-style-type: none"> <li>• Center positions and other emergency response teams</li> <li>• Coordinate National Guard assistance, when requested and upon approval by the governor</li> <li>• Coordinate, allocate, prioritize and lead the hand-off of international, domestic and Emergency Management Assistance Compact offers of mass care, emergency assistance, interim housing and human services</li> <li>• Develop Situational Reports for all disaster mass care, emergency assistance, temporary housing and human service resources utilized</li> <li>• Assist in coordinating the provision of temporary emergency power to critical facilities (e.g., hospitals, shelters)</li> <li>• Establish and coordinate Disaster Case Management for the state</li> <li>• Manage requests for proposals and/or contracts with entities who support Disaster Case Management activities</li> </ul>
<b>Montana Department of Public Health and Human Services / Human and</b>	<ul style="list-style-type: none"> <li>• Support pre-planning for vulnerable populations and communities who may be impacted by a disaster</li> </ul>	<ul style="list-style-type: none"> <li>• Provide subject-matter expertise and technical assistance related to health and human services for those impacted by disasters</li> </ul>

Organization	Pre-Disaster Duties	Post-Disaster Duties
<b>Community Services Division</b>	<ul style="list-style-type: none"> <li>Administers the Low-Income Home Energy Assistance Program</li> <li>Administers the Weatherization Assistance Program</li> </ul>	
<b>Montana Department of Public Health and Human Services / Public Health and Safety Division</b>	<ul style="list-style-type: none"> <li>Support pre-planning for vulnerable populations and communities who may be impacted by a disaster</li> <li>Issues licenses and reviews and approves plans for operations of trailer courts</li> </ul>	<ul style="list-style-type: none"> <li>Work with Montana Voluntary Organizations Active in Disaster partners to track unmet needs and assist in collaboration efforts with additional agencies to provide strategies, resources and programs to address them</li> </ul>

## Local and Non-Governmental Organizations

Organization	Pre-Disaster Duties	Post-Disaster Duties
<b>Local Public Housing and Tribal Authorities</b>	<ul style="list-style-type: none"> <li>Support in administering services and housing programs directed at assisting low- and moderate-income families who are seeking housing assistance</li> </ul>	<ul style="list-style-type: none"> <li>Serve as a communications hub following a disaster</li> </ul>
<b>Montana Association of Counties</b>	<ul style="list-style-type: none"> <li>Provide advocacy and education on behalf of the State of Montana’s 56 counties for legislative issues related to housing</li> </ul>	<ul style="list-style-type: none"> <li>Serve as a communications hub following a disaster with key county stakeholders</li> </ul>
<b>Montana League of Cities and Towns</b>	<ul style="list-style-type: none"> <li>Provide advisory assistance on behalf of 127 municipalities across the State of Montana for housing issues</li> </ul>	<ul style="list-style-type: none"> <li>Serve as a communications hub following a disaster with</li> </ul>

Organization	Pre-Disaster Duties	Post-Disaster Duties
	<ul style="list-style-type: none"> <li>• Serve as a conduit between municipal officials and state and federal governments</li> </ul>	key municipal stakeholders
<b>Industry Associations</b>	<ul style="list-style-type: none"> <li>• Support pre-disaster housing planning through recommended best practices</li> </ul>	<ul style="list-style-type: none"> <li>• Provide subject-matter expertise</li> </ul>
<b>Local Emergency Managers</b>	<ul style="list-style-type: none"> <li>• Support pre-disaster housing planning at the local level</li> <li>• Serve as conduit between local entities and the state</li> </ul>	<ul style="list-style-type: none"> <li>• Support with organizing, coordinating and advancing housing efforts</li> <li>• Lead and direct housing recovery operations at the local level</li> </ul>

## Federal Organizations

Organization	Pre-Disaster Duties	Post-Disaster Duties
<b>Federal Emergency Management Agency</b>	<ul style="list-style-type: none"> <li>• Develop planning guides designed to help states and local partners prepare for and recover following disasters as it related to emergency management</li> <li>• Establish policies and procedures for providing direct housing to individuals and households affected by a disaster</li> </ul>	<ul style="list-style-type: none"> <li>• Provide subject-matter expertise on emergency management concerns</li> <li>• Administer essential grant programs that can support housing assistance</li> <li>• Coordinate the provision of essential services post-disaster</li> </ul>
<b>U.S. Department of Housing and Urban Development</b>	<ul style="list-style-type: none"> <li>• Develop planning guides designed to help states and local partners prepare for and recover following disasters as it relates to housing</li> <li>• Establish policies and procedures for providing direct housing to</li> </ul>	<ul style="list-style-type: none"> <li>• Provide subject-matter expertise on housing concerns</li> <li>• Administer essential grant programs that can</li> </ul>

Organization	Pre-Disaster Duties	Post-Disaster Duties
	individuals and households affected by a disaster	support housing assistance

## Disaster Housing Working Group Incident-Specific Members Roles and Responsibilities

The tables below detail roles and responsibilities for **Disaster Housing Working Group Incident-Specific Members**.

*Please note that the roles and responsibilities outlined in the table represent a sample of key functions for each organization. Actual duties may vary based on the specific nature of an emergency, the operational environment and the evolving needs of response and recovery efforts. Additional responsibilities may be assigned as necessary to ensure an effective and coordinated approach to incident management.*

### State Organizations

Organization	Pre-Disaster Duties	Post-Disaster Duties
<b>Montana Department of Environmental Quality: Energy Bureau</b>	<ul style="list-style-type: none"> <li>Support with pre-planning for environmental mitigation strategies related to housing initiatives (e.g., energy codes for buildings; energy planning, finance and technical assistance; indoor air program for naturally occurring radon gas)</li> </ul>	<ul style="list-style-type: none"> <li>Provide technical support with disaster response involving environmental factors, rules and regulations</li> </ul>
<b>Montana Department of Environmental</b>	<ul style="list-style-type: none"> <li>Support with pre-planning for environmental mitigation strategies related to housing initiatives</li> </ul>	<ul style="list-style-type: none"> <li>Provide technical support with disaster response involving environmental factors, rules and regulations</li> </ul>

Organization	Pre-Disaster Duties	Post-Disaster Duties
<b>Quality: Engineering Bureau</b>	<ul style="list-style-type: none"> <li>• Conduct reviews on divisions relating to sanitation facilities, including the water supply, sewage disposal, solid waste disposal and storm drainage systems</li> <li>• Reviews and approves water systems for subdivisions</li> </ul>	<ul style="list-style-type: none"> <li>• Provide engineering personnel to assist in damage assessment, structural inspections of drinking water, wastewater and/or solid waste facility, design estimation, in determining the operating status of drinking water and wastewater systems, and construction for repair, reconstruction and restoration of eligible facilities</li> </ul>
<b>Department of Labor and Industry / Division of Insurance</b>	<ul style="list-style-type: none"> <li>• Support pre-planning for worker safety and health issues</li> </ul>	<ul style="list-style-type: none"> <li>• Provide technical assistance related to worker safety and health issues</li> <li>• Provide advice and assistance to disaster victims</li> <li>• Provide consumer protection services and investigate complaints against insurance companies doing business in the State of Montana</li> <li>• Provide regulatory professional licensing waivers and exemptions following a disaster</li> </ul>
<b>Department of Labor and Industry / Business Standards Division</b>	<ul style="list-style-type: none"> <li>• Issue and expedite building permits and performs inspections to ensure compliance with Building Codes</li> <li>• Issue and expedite permits for building, mechanical, plumbing and electrical</li> </ul>	<ul style="list-style-type: none"> <li>• Provide regulatory and professional licensing waivers and exemptions following a disaster</li> <li>• Provide technical assistance related to worker safety and health issues</li> </ul>

Organization	Pre-Disaster Duties	Post-Disaster Duties
		<ul style="list-style-type: none"> <li>• Provide advice and assistance to disaster victims</li> </ul>
<b>Department of Natural Resources and Conservation</b>	<ul style="list-style-type: none"> <li>• Support pre-planning for preserving, protecting and conserving natural resources</li> </ul>	<ul style="list-style-type: none"> <li>• Provide assistance with managing and protecting land and water resources following a disaster</li> </ul>
<b>Governor’s Office of Indian Affairs</b>	<ul style="list-style-type: none"> <li>• Serve as a conduit/liaison between the State of Montana government and tribal communities</li> </ul>	<ul style="list-style-type: none"> <li>• Serve as a communications hub following a disaster with key tribal communities</li> </ul>

## Local and Non-Governmental Organizations

Organization	Pre-Disaster Duties	Post-Disaster Duties
<b>Montana Voluntary Organizations Active in Disasters</b>	<ul style="list-style-type: none"> <li>• Provide communication, coordination and collaboration support between the State of Montana government and local community organizations</li> <li>• Support pre-planning for housing/sheltering resources</li> <li>• Support planning related to Emergency Support Function #6 for Mass Care, Emergency Assistance, Housing and Human Services</li> <li>• Maintain a directory of organizations that can provide Disaster Case Management services</li> </ul>	<ul style="list-style-type: none"> <li>• Coordinate the provision of Disaster Case Management services</li> <li>• Coordinate interim housing/sheltering resources</li> <li>• Coordinate technical assistance for interim housing</li> <li>• Provide logistical support to document funding opportunities for home repairs</li> <li>• Support in the provision of emergency services (e.g., food, hygiene services, mental health support)</li> </ul>

Organization	Pre-Disaster Duties	Post-Disaster Duties
<b>Centers for Independent Living</b>	<ul style="list-style-type: none"> <li>Support with planning and pre-identifying interim housing, especially those with access and functional needs</li> </ul>	<ul style="list-style-type: none"> <li>Coordinate and secure interim housing solutions, especially those with access and functional needs</li> </ul>
<b>American Red Cross</b>	<ul style="list-style-type: none"> <li>Support the pre-planning and maintenance of shelters</li> <li>Support the pre-planning and identification of essential resources for those potentially impacted by a disaster</li> </ul>	<ul style="list-style-type: none"> <li>Maintain shelters post-disaster</li> <li>Support communications and awareness of shelter locations</li> <li>Provide and/or coordinate the provision of essential services to displaced individuals (e.g., food, mental health services)</li> <li>Mobilize volunteers to support disaster victims</li> </ul>
<b>Salvation Army</b>	<ul style="list-style-type: none"> <li>Support the pre-planning and maintenance of shelters</li> <li>Support the pre-planning and identification of essential resources for those potentially impacted by a disaster</li> </ul>	<ul style="list-style-type: none"> <li>Maintain shelters post-disaster</li> <li>Support communications and awareness of shelter locations</li> <li>Provide and/or coordinate the provision of essential services to displaced individuals (e.g., food, water, mental health services)</li> <li>Mobilize volunteers to support disaster victims</li> </ul>
<b>United Way</b>	<ul style="list-style-type: none"> <li>Support the pre-planning and maintenance of shelters</li> <li>Support the pre-planning and identification of essential resources for those potentially impacted by a disaster</li> </ul>	<ul style="list-style-type: none"> <li>Maintain shelters post-disaster</li> <li>Support communications and awareness of shelter locations</li> <li>Provide and/or coordinate the provision of essential services to displaced individuals (e.g., food, water, mental health services)</li> </ul>

Organization	Pre-Disaster Duties	Post-Disaster Duties
		<ul style="list-style-type: none"> <li>Mobilize volunteers to support disaster victims</li> </ul>
<b>Food Bank Network</b>	<ul style="list-style-type: none"> <li>Support the pre-planning and identification of essential food resources for those potentially impacted by a disaster</li> <li>Provide food to at-risk populations</li> </ul>	<ul style="list-style-type: none"> <li>Provide and/or coordinate the provision of food to those impacted by a disaster</li> </ul>
<b>Montana Continuum of Care Coalition</b>	<ul style="list-style-type: none"> <li>Coordinate housing assistance with service providers for individuals, families and youth experiencing homelessness</li> </ul>	<ul style="list-style-type: none"> <li>Coordinate and secure sheltering and interim housing solutions for at-risk populations following a disaster</li> </ul>

## Federal Organizations

Organization	Pre-Disaster Duties	Post-Disaster Duties
<b>U.S. Department of Agriculture Rural Development</b>	<ul style="list-style-type: none"> <li>Provide assistance to agricultural partners with pre-planning for disasters</li> <li>Develop planning guides designed to help agricultural partners prepare for and recover following disasters</li> </ul>	<ul style="list-style-type: none"> <li>Provide support for agricultural partners following a disaster (e.g., livestock assistance, farmland damage)</li> <li>Administer grant programs to impact agricultural partners impacts by a disaster</li> <li>Provide subject-matter expertise on agricultural and farming topics</li> </ul>
<b>U.S. Department of Treasury</b>	<ul style="list-style-type: none"> <li>Develop and manage financial policies and funding mechanisms</li> </ul>	<ul style="list-style-type: none"> <li>Administer disaster-related tax relief and financial assistance programs</li> <li>Distribute and oversee funding</li> </ul>

 **COMMERCE**

Organization	Pre-Disaster Duties	Post-Disaster Duties
	<ul style="list-style-type: none"><li>• Oversee tax incentives to support disaster preparedness</li><li>• Coordinate financial resources</li><li>• Maintain and enforce tax policies that support mitigation efforts</li></ul>	<ul style="list-style-type: none"><li>• Ensure financial institutions provide accessible recovery loans and mortgage relief</li><li>• Monitor and prevent financial fraud related to disaster assistance and housing programs</li></ul>

## Appendix 5: Sheltering for Catastrophic Events

Sheltering for catastrophic events requires federal assistance and/or neighboring state resources to be engaged as a means to meet the needs of survivors. To assist with a catastrophic event, the American Red Cross has over 58,000 facilities registered nationwide in the National Shelter System database that can be used as general population shelters. It is important to note that this number does not reflect the nation's actual sheltering capability.

As a part of the immediate response phase of catastrophic situations, existing sheltering resources may not be sufficient. New and creative measures to shelter people will need to be identified, considered and implemented. The Federal Emergency Management Agency, through the allocation of appropriate resources and in coordination with Emergency Support Function #6 partners, can support the relocation and sheltering of large populations needing to be moved intra or interstate. If emergency shelters are overwhelmed, or the determination is made that sheltered residents and evacuees will not be able to return to their homes for an extended period of time, the State of Montana may request that the Federal Emergency Management Agency authorize Transitional Shelter Assistance. If Transitional Sheltering Assistance is requested and authorized, the Federal Emergency Management Agency will approve, fund and administer the use of hotels and/or motels as transitional shelters. As a federally funded program, lodging providers participating in Transitional Sheltering Assistance must comply with the accessibility requirements of Section 504 of the Rehabilitation Act and the nondiscrimination provisions of the Robert T. Stafford Act and the Post - Katrina Emergency Management Reform Act by providing an equal opportunity to participate in the program to individuals with disabilities. The initial period of assistance established by the Federal Emergency Management Agency may be up to 30 days, and Federal Emergency Management Agency assistance can be extended when warranted and requested by Montana. (Transitional Sheltering Assistance is funded under the Public

Assistance Program, Section 403 and Category B Emergency Protective Measures and is subject to Public Assistance regulation regarding state cost share.)

**Shelter Operations:** Shelter operations are primarily a local responsibility and will rely initially on resources currently stored or available within a community. The opening of a shelter is based on the risk assessment and the established sheltering plan, determined by the Emergency Operations Center for the community.

- Emergency planners should anticipate 10 - 20% of those affected by the disaster to seek congregate care shelter services.
- Shelters should operate on a 24/7 basis until those displaced and residing in shelters are able to secure other housing solutions.
- A system for effective communication with established shelters will need to be coordinated by the local/tribal officials, with federal and state support as needed.
- Due to public expectations, jurisdictions should plan emergency household pet sheltering either with or near their owners.
- By law, service animals will be allowed to remain with the persons they serve in all shelters.
- When jurisdictions open shelters immediately following a disaster impact, there may be limited services or supplies (e.g., cots and blankets) available during the first 24 – 72 hours of operation.

**Facilities:** Facilities selected for sheltering will meet the minimum criteria including, but not limited to, considerations for size and configuration of interior space; ability to withstand hazards; American with Disabilities Act compliant accessibility; restrooms; supplies/provisions; emergency power; security; and availability. Congregate shelter facilities provide a safe, sanitary and secure environment, as well as life sustaining services, for disaster survivors.

- Affected individuals may prefer to shelter near or in close proximity to their property.
- Shelter facilities are not designed or intended to serve as long-term housing solutions.
- Shelter facilities should be compliant/accessible as stated by the Architectural Barriers Act and American with Disabilities Act.
- Local/tribal emergency management, in coordination with health agencies and non-governmental organizations, must plan and organize shelters in accordance with existing laws and organizational protocols.
- Faith based organizations, community organizations, other non-governmental organizations and spontaneous shelters will participate in providing shelter services.
- Urban areas with high concentrations of industry and population may be at a higher risk of secondary hazard events, (fires, floods) may further restrict the availability of shelter facilities.

**Other Considerations:** State, tribal, local agencies and voluntary organizations are generally capable of addressing the immediate sheltering needs for the majority of disasters/emergencies. The transition from sheltering to interim or permanent housing will be assisted by local entities, state entities and other housing organizations or committees. Jurisdictions will need to assist individuals and households that are ineligible for government housing programs in finding solutions to meet their housing needs.

- Many affected households will opt to stay with family and friends (self-sheltering) in the effected and surrounding areas.
- When the capacity of local/tribal/state sheltering options are exceeded, relocation of families to housing facilities outside the impacted area may be necessary until housing resources become available in the respective area or community. It may

be necessary to establish sheltering agreements with neighboring municipalities and states (host areas).

- Shelter operators should coordinate with officials and others in the community to ensure alternate arrangements for public transportation, accessible public transportation, access to financial institutions and access to other essential services, as needed.
- When developing plans for operating and closing congregate shelters, it will be necessary to consider accommodating sheltering personnel required to support the response and recovery process.
- Alternative means or assistive services to communicate with shelter residents will be necessary (i.e., hearing, seeing or cognitive restrictions or limited English proficiency).
- There may be an influx of disaster workers, insurance adjusters, building inspectors, construction workers and news media personnel competing with disaster survivors for housing resources.

## Appendix 6: Sheltering Identification

After a disaster, it is essential for the State of Montana to identify, maintain awareness of and communicate the status and location of shelters to assist those in need. Tools that can be used to assist with this process include:

### **National Shelter System**

One current tool that can be leveraged includes the Federal Emergency Management Agency's National Shelter System database. The National Shelter System is synchronized every day with the American Red Cross Shelter Database to support federal, state and local government agencies and voluntary organizations who are responsible for mass care and emergency assistance. This tool is available here: <https://www.arcgis.com/home/item.html?id=d000037396514f70a2ba3683e037caee>.

### **American Red Cross Database**

Similarly, the American Red Cross maintains a map/database that documents shelters that are currently open and operated by the American Red Cross or other partner agencies. This tool is available here: <https://www.redcross.org/get-help/disaster-relief-and-recovery-services/find-an-open-shelter.html>.

### **State of Montana Shelter Tracking**

The State of Montana currently tracks the identification and operational status of shelters through communicating with local emergency managers and state-level partners. Following a disaster, local emergency managers will be responsible for notifying Montana Disaster and Emergency Services of shelter status. Montana Disaster and Emergency Services will share that information with the Department of Commerce Housing Division for situational awareness.

## Appendix 7: Lessons Learned and Best Practices

A number of policy or position papers, reports, studies and web-based resources exist related to the challenges and solutions to the provision of temporary shelter necessitated by disaster. The articles cited below are a very small sample of the resources available and are not meant to be exhaustive.

**Experts Roundtable on Enhancing Housing Resilience, hosted by the National Governors Association:** Many states face dual challenges in ensuring a more resilient housing sector such as hurdles in standing up a disaster recovery program and associated gaps in near- and long-term actions that could lead to more resilient housing stock. That was the key takeaway from a January 2019 Experts Roundtable on Enhancing Housing Resilience, hosted by the National Governors Association, in conjunction with the Institute for Building Technology and Safety. The roundtable gathered two dozen state, federal, nonprofit and research experts for a day-long examination of policies and actions to improve the resilience of the nation's housing stock (both damaged and unharmed). The event also included a discussion of ways states can optimally structure the administration of federally supported mitigation programs, including how to build resilience into planning processes before a disaster strikes.

Throughout the Experts Roundtable, numerous best practices and key takeaways emerged. These actions could be put in motion by governors, in the short, medium and long term, to make their state and the housing stock more resilient in the face of more frequent destructive natural disasters.

During Blue Skies:

- State and local agencies should hold interagency response and recovery planning meetings in advance of any disaster, and hold them routinely, to ensure

“business cards are not exchanged during a disaster.” Through this effort, the governor can ensure working relationships among emergency managers, Community Development Block Grant administrators, state insurance commissioners, state and local recovery planners, community and urban planners, as well as nonprofit organizations that mobilize in response to disasters.

- Governors should consider creating the position of ‘Chief Resilience Officer’ in a senior place within the gubernatorial policy office, or restructuring state agencies to elevate the importance of resilience. Institutionalizing resilient recovery processes with a dedicated trained recovery staff can help to ensure a coordinated government approach to the deployment of mitigation funding.
- A disaster can hit without warning, requiring immediate response from the governor and state emergency managers. It is important for gubernatorial staff to know all specific executive authorities in advance of a disaster to avoid having to do legal research amid a crisis. It is equally important for newly elected governors and their transition teams to have disaster plans ready and thought out prior to inauguration.
- The state also should prepare a list of pre-qualified contractors before any disaster hits, whether to help administer the recovery program or carry out architectural, engineering and construction management tasks including immediate debris removal.
- Building codes should be examined, updated and enforced to ensure the most modern and protective enhancements are applied to the state’s housing stock. In addition, the state should take steps to examine existing housing for vulnerable populations and whether they are subjected to higher risks during various disaster response and recovery scenarios.
- State emergency managers should develop robust data management systems in advance of any disaster so that the state has the most relevant and up-to-date

data available to it. The data holders or managers from various state agencies should be included in emergency operation center drills and scenarios to ensure effective handoff and analysis of data.

- With the passage of the federal Disaster Recovery Reform Act in 2018, which will increase the authorized amount of Federal Emergency Management Agency mitigation funding and change how it is administered, states should begin to plan for how they will apply for and use any Disaster Recovery Reform Act Pre-Disaster Mitigation that will be made available. This includes beginning to share information across sectors within state governments.

Additional best practices and resources are noted in the table below:

Resource	Description
<p><b>A study on the condition of temporary housing following disasters: Focus on container housing</b></p>	<ul style="list-style-type: none"> <li>• This study conducts an investigation on temporary housing in disaster areas and a survey on the condition of containers used as buildings. The construction of temporary housing in disaster areas using containers is proposed as an application solution. With its advantage of combination and splitting, the modularity of containers offers a wide range of implementation possibilities for container housing in disaster areas. Specific housing needs of various types of victims can be easily satisfied through the different organizations of various units.</li> </ul>
<p><b>Affordable Housing After a Disaster, by <a href="#">Donna Kimura</a></b></p>	<ul style="list-style-type: none"> <li>• As millions of barrels of oil poured into the Gulf of Mexico from a blown BP oil rig in 2010, a group of lawyers began thinking about what happens after a disaster. They talked about the opportunities for a community, the legal resources available and the lessons learned. Those discussions became the genesis of a new book from the American Bar Association’s Forum on Affordable Housing and Community Development Law. <i>Building Community Resilience Post-Disaster: A Guide for Affordable Housing and Community Economic Development Practitioners</i> provides detailed case studies from the Sept. 11 terrorist</li> </ul>

Resource	Description
	<p>attacks to Hurricane Katrina. The 459-page book’s publication is timely as new disasters strike communities each year. <i>Building Community Resilience Post-Disaster</i> is edited by Forum members Dorcas R. Gilmore and Diane M. Standaert and features contributions from several housing and economic development authorities.</p>
<p><b>Pre-Disaster Recovery Planning Guide for Local Governments, Federal Emergency Management Agency</b></p>	<ul style="list-style-type: none"> <li>• This planning guide is designed to help local governments prepare for recovery by developing pre-disaster recovery plans that follow a process to engage members of the whole community, develop recovery capabilities across governmental and non-governmental partners, and ultimately create an organizational framework for comprehensive local recovery efforts.</li> </ul>
<p><b>Public Housing Authority Disaster Readiness and Preparation Guide, U.S. Department of Housing and Urban Development, Office of Public and Indian Housing</b></p>	<ul style="list-style-type: none"> <li>• In the past decade, Public Housing Authorities have been affected by natural disasters. Examples include the Public Housing Authorities affected by Hurricanes Sandy, Ike, Rita and Katrina, tornados and various floods. These disasters resulted in both loss of life and property damage. In order to protect their properties and their tenants, many Public Housing Authorities have prepared emergency plans or disaster response plans to prepare staff and tenant households for emergencies. At various times, the U.S. Department of Housing and Urban Development has sought to learn how Public Housing Authorities have prepared for emergencies as well as the lessons learned in the aftermath. Accordingly, the U.S. Department of Housing and Urban Development has reviewed emergency plans prepared by Public Housing Authorities and engaged executive directors and staff at Public Housing Authorities that have been affected by a disaster. This document discusses some of the best practices and lessons Public Housing Authorities have shared with the U.S.</li> </ul>

Resource	Description
	Department of Housing and Urban Development based on their local knowledge and experience.

## Appendix 8: Pre-Disaster Housing Planning

### Initiative Next Steps

The Federal Emergency Management Agency and the U.S. Department of Housing and Urban Development developed the Pre-Disaster Housing Planning Initiative in 2023 to promote collaborative approaches to disaster housing recovery challenges and support state planning for housing recovery before disasters occur. The Pre-Disaster Housing Planning Initiative was intended to provide states with targeted resources and technical support to develop pre-disaster housing strategies or plans and offered a venue for state emergency management and housing agencies to collaborate to create comprehensive housing recovery plans. The Pre-Disaster Housing Planning Initiative effort engaged both emergency management and housing representatives from the following states: Montana, Louisiana, New Jersey and Washington.

The Pre-Disaster Housing Planning Initiative engagement culminated in a Housing Summit in November 2023, which was hosted in Chicago, Illinois. The Summit provided an opportunity for the State of Montana to learn from other states in addition to having targeted discussions on how to further support disaster housing planning. The following list summarizes the key takeaways/action items identified through the Summit:

- **Clarify Roles and Responsibilities:** The State of Montana should consider developing a complete list of local/county entities, including points of contact, and document the responsibilities and roles of local emergency management partners, Voluntary Organizations Active in Disaster and housing managers in the Disaster Housing Strategy.

- **Identify and Document High-Risk/High-Vulnerable Communities:** The State of Montana should consider identifying and documenting, within the Disaster Housing Strategy, high-risk/high-vulnerability geographic regions across the State of Montana as it relates to emergency management and disaster housing needs. To further build on this, the State of Montana should also consider identifying potential emergency shelter sites at the local/county level and develop/implement a methodology to rank those communities by their associated risk profile.
- **Develop Engagement Strategies:** The State of Montana should consider developing strategies to engage state leadership on essential emergency management and disaster housing needs. To build on this, the State could also consider leveraging existing work groups to create a coalition of local governments with shared interests and concerns to further support disaster housing planning.
- **Clarify the Transition from Emergency Housing to Transitional/Permanent Housing:** Through the development of the Housing Recovery Support Function, the State of Montana should further identify/refine criteria for the transition from emergency housing to transitional/permanent housing. Furthermore, state partners would benefit from additional guidance on how emergency management and housing partners should coordinate during that transition process.
- **Develop Outreach and Training Materials:** The State of Montana should consider developing outreach/training materials on the Disaster Housing Strategy, once complete, for onboarding new managers and partners who will have a role in emergency management and disaster housing operations. These materials could also be used to engage, and garner buy in from senior and state leadership.