

FY2013-2014 Year Four

*of the FY2010-2014
Consolidated Plan*

City of Billings Annual Action Plan



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SECTION ONE - Executive Summary

Five-year Consolidated Plans and one-year action plans are required by the United States Department of Housing and Urban Development (HUD) for the City of Billings to participate in and receive funding through the Community Development Block Grant (CDBG) and HOME Investment Partnership programs (HOME).

The City of Billings, acting primarily through the Community Development Division, will continue to act as the lead agency for administration of the City's CDBG and HOME program activities targeted to meet the goals of the Consolidated Plan. The City works closely with the Housing Authority of Billings, nonprofit organizations, private developers, lending institutions, and neighborhood groups to garner feedback on proposed strategies and also to meet the goals established in Consolidated and Annual Action Plans.

Consolidated planning activities are also required for homeless programs funded under the McKinney-Vento Homeless Assistance Act and the Housing Opportunities for Persons with AIDS (HOPWA) Program. The City does not receive McKinney funds or HOPWA funds directly. Separate Consolidated Plans are prepared by the City of Great Falls, the City of Missoula, and the State of Montana for non-entitlement areas of the state. The structure and content of this plan are based on specific HUD requirement for the preparation of the Consolidated Plan. Many terms used in this document are specific to the Consolidated Plan process and HUD programs. The reader may consult with the City of Billings - Community Development Division for additional information.

Focused on CDBG and HOME activities, the Consolidated and Annual Action Plan combines the planning and application requirements for the CDBG and HOME programs. Consolidation of the submission requirements for the CDBG and HOME programs allows program planning and citizen participation to take place in a comprehensive context covering both programs. The CDBG and HOME programs covered by the Consolidated Plan have three basic goals:

1. **To provide decent housing**, including: maintaining the affordable housing stock in the community; increasing the availability of permanent housing that is affordable to lower-income households without discrimination; increasing support of housing which enables persons with special needs to live independently; and assisting homeless persons obtain affordable housing.
2. **To provide a suitable living environment**, which includes: improving the safety and livability of neighborhoods; increasing access to quality facilities and services; reducing the isolation of low-income households within areas by de-concentrating housing opportunities and revitalizing deteriorating neighborhoods; restoring and preserving natural and physical features of special value for historic, architectural, or aesthetic reasons; and conserving energy resources.
3. **To expand economic opportunities**, including: creating jobs accessible to lower-income individuals; providing access to credit for community development activities which promote long-term economic and social viability; and empowering lower-income persons living in federally assisted and public housing to achieve self-sufficiency.

All activities undertaken by the City utilizing CDBG and HOME funding must primarily benefit low-income persons. The strategies described in the Consolidated Plan outline a specific course of action for the community's housing and community development activities. The plan builds on local assets to meet the needs of the community and sets forth goals, objectives, and performance measures to ensure progress in achieving the strategies described in the plan.

Purpose of the Consolidated Plan

The purpose of the Consolidated Plan is to identify the housing and community development needs of low-income households in Billings and develop strategies for addressing those needs in a comprehensive, coordinated fashion utilizing available federal and nonfederal resources.

Consolidated plans are developed every five years and must be submitted to HUD not less than 45 days prior to the start of the grantee's program year start date (July 1 for the City). The City's five-year [Consolidated Plan for FY2010-2014](#) identifies activities to be carried out from July 1, 2010 through June 30, 2015 to address priority needs in the community and serves as a guiding document for the use of the City's CDBG Program and HOME funding.

This document constitutes the City's one-year Annual Action Plan for FY2013-2014 which identifies goals and strategies to be undertaken from July 1, 2013 through June 30, 2014. While both documents contain similar information, a more detailed presentation of needs and overarching strategies is described in the five-year plan. The Annual Action Plan describes identified resources to be utilized during the program year, which is not identified in the five-year plan. The City must also report on the performance of activities funded via the Comprehensive Annual Performance Evaluation Report (CAPER) in September of each year.

The FY2010-2014 Consolidated Plan and the FY2013-2014 Annual Action Plan followed a development process which integrated priorities identified in the 2010 Billings Housing Needs Assessment and the 2013 Analysis of Impediments to Fair Housing Choice. The development process also included input from neighborhood groups and public hearings on housing and community development needs, relative to findings from both data studies.

The FY2010-2014 Consolidated Plan and the FY2013-2014 Annual Action Plan was open for public comment extending from March 22, 2013 through April 22, 2013. A public hearing was held on April 22, 2013 during the Billings City Council meeting to accept public comments on the Annual Action Plan, and Community Development Board recommendations for funding allocation. The plan was adopted by the Billings City Council on April 22, 2013.

HUD Objectives and Outcomes

HUD has developed specific performance measurements for each activity undertaken utilizing CDBG and / or HOME funding. The City's application process for funding through these programs includes identification of HUD objectives and outcomes to ensure compliance with activity requirements.

HUD PERFORMANCE MEASUREMENTS	
<i>Objectives</i>	<i>Outcomes</i>
Suitable Living Environment	Availability or Accessibility
Decent Housing	Affordability
Economic Opportunities	Sustainability

City Objectives & Outcomes

The City's objectives and outcomes are briefly identified below. Strategies, objectives and activities were determined utilizing a combination of data from housing needs and fair housing studies, in addition to seeking extensive public comment and input on the overall development of this plan. This year's focus is greatly reduced due to declining federal resources. Therefore, the City has prioritized affordable housing preservation and new affordable housing opportunities. A more comprehensive chart can be found in Table 3A, Section Eight.

Strategy	Objective	Activity	Measurement Type	FY13-14 Goals
A: Promote the preservation of the existing supply of safe, affordable housing in the community.	Provide direct, affordable financing and assistance to low-income homeowners for the completion of needed repairs, citywide.	Housing Rehabilitation Loan Program	Housing Units	10
		Manufactured Home Repair Loan Program	Housing Units	5
		Foreclosure Acquisition / Rehabilitation Loan Program	Housing Units	1
B: Promote new affordable housing opportunities.	Encourage the development of new affordable single-family, multi-family and special needs housing in the community through private developers and non-profit organizations.	Affordable Housing Development Program	Housing Units	16 Units Total 4 CHDO Units
		Complete Kings Green single-family development	Housing Units	4
	Provide affordable financing and support to promote homeownership opportunities citywide.	First Time Homebuyer Program	Households	30
		Homebuyer Education	Households	100
C: Active partnerships with non-profits, neighborhood groups and others to address housing and community development specific to lower income and special needs households.	Support partnerships and regular meetings to facilitate community participation and collaboration.	Affordable Housing Task Force	Quarterly Meetings	4
		Billings Partners American Indian Homeownership	Quarterly Meetings	4
		Fair Housing	Completed Annual Action Plan addressing issues	1
	Encourage activities that promote fair housing and increase awareness of the rights of protected classes.	Continue to support organizations with an interest in fair housing to apply for fair housing funding, dependent on staff availability	Grant application submitted	0 or 1
	Encourage collaboration to better address needs and to respond to opportunities for special needs populations.	Mayor's Committee on Homelessness	Bi-Monthly Meetings	6
		Assist in the implementation of Welcome Home Billings, the City's ten-year plan to impact homelessness.	Completed FY2013-2014 Staff Action Plan	1
			Completed FY2012-2013 Performance Report	1
		Facilitate AmeriCorps VISTA application and pursue project status	Annual submission of VISTA grant application / VISTA member placements	1
D: Promote the preservation and revitalization of the community's older neighborhoods.	Preserve housing stock in older, lower-income neighborhoods.	See objectives / activities / goals outlined in Strategy A		-
	Infill development of vacant lots and redevelopment of substandard properties.	Affordable Housing Development Program	See goals for Strategy B	-
		Redevelopment 27th Street Corridor	Redevelopment Projects	1

Past Performance

The City - Community Development Division receives written comments from HUD regarding action plans and performance annually. Overall evaluations conclude the City's CDBG and HOME programs are making strides in providing affordable housing and addressing community needs.

General: According to the HUD's annual assessment of performance for last year, the City is meeting the primary objective of the CDBG program and has expended 96.4% of funding to benefit low income populations, exceeding minimum requirement for the primary purpose of the program. Projects funded were consistent with strategies and objectives in the Consolidated and Annual Action Plans. The City's Comprehensive Annual Performance Evaluation Report (CAPER) clearly described the City's priorities through the use of illustrative charts. The City has met both CDBG and HOME timeliness goals without fail since 2006 and has consistently been in compliance with administration and public service caps.

Fair Housing: The HUD Fair Housing Equal Opportunity Officer review for last year's Action Plan found the City met all elements necessary to affirmatively further fair housing. The City has achieved a LOW risk rating.

Corrections: The City received HUD's CAPER review on December 17, 2012. HUD identified a finding relative to the South 27th Street Redevelopment project, which began in the 1980s. The City has maintained lots purchased with CDBG funding utilizing a property disposition activity to pay for maintenance and assessments within the CDBG program. The City responded to this finding by closing all property maintenance accounts and ceasing expenditures for maintenance through CDBG. City staff received approval through the Billings City Council on February 11, 2013 to utilize proceeds from a recent non-federal land sale to send the appraised value of the CDBG lots to HUD in order to release restrictions on the lots. This funding will be allocated to the City through HUD's line of credit system and will be allocated for the FY2013-2014 fiscal year.

HUD also noted a concern regarding methodology utilized by staff to create the PR26 report. Staff has requested technical assistance be provided to the City.

As of March 13, 2013, the above finding and concern have been cleared by HUD.

Please refer to the latest [CAPER](#) for an analysis of the City's performance on Consolidated Plan goals for recent years and the resources utilized to meet objectives established (www.ci.billings.mt.us). HUD's assessment of the City's activities is available upon request.

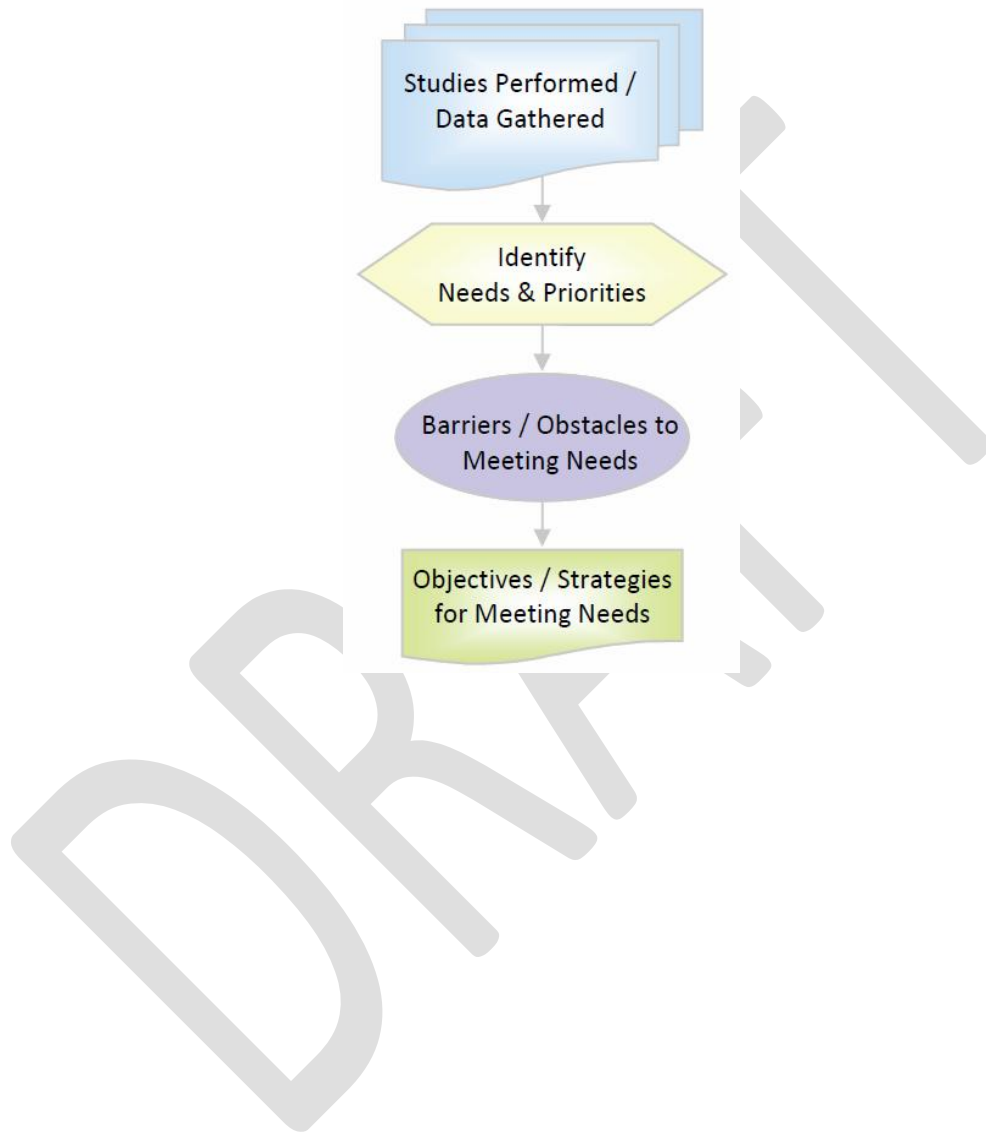
Community Development Division Vision / Mission

Vision: The Community Development Division acts as a catalyst for joining community partners with resources to increase access to housing, to create a sustainable community, and to promote neighborhood revitalization.

Mission: The Community Development Division strives to exceed the expectations of our stakeholders by supporting our housing and community partners with quality leadership, accountability, and innovative programs and services.

Report Standards

All reports generated by the Community Development Division are based on studies and data, the identification of needs and priorities, identifying obstacles and barriers to meeting those needs, and creating objectives and strategies to meet identified needs.



SECTION TWO - Consultation & Coordination

91.200 (b) & 91.215(l)

General

91.100(a)(1)

A number of organizations in the community are involved in affordable housing and community development-related activities in Billings and are asked to comment on the Consolidated and Annual Action Plans. The continued cooperation of these organizations in pursuing affordable housing for the community is required to meet the Consolidated Plan goals. Consultations include review of the plan with public and private agencies that provide health care, social services and fair housing education. Populations targeted for consultation include agencies that provide services for children, the elderly, the disabled, persons with HIV / AIDS and their families, and homeless individuals and families.

The Consolidated Plan is distributed widely during the public comment period and interested persons can attend a number of staff-facilitated, regularly scheduled meetings to find out more about Community Development initiatives. Routine meetings are facilitated through staff for the Community Development Board, the Billings Partners for American Indian Homeownership, the Affordable Housing Task Force, the Billings Area Resource Network and the Mayor's Committee on Homelessness. Additional information regarding these groups can be found throughout the Consolidated and Annual Action Plans

The City impacts new and existing housing development and neighborhood revitalization through neighborhood planning, development standards, capital improvement programs, the Annexation Policy, and the Growth Policy.

Regulation Citations

Throughout the Consolidated Plan, staff members have identified regulatory citations for the Code of Federal Regulations (CFR), shown in italics. The code references are located in sections of the Consolidated Plan required by regulation.

Homeless Strategy & Housing Opportunities for Persons with AIDS

91.100(a)(2) & 91.100(b)

Public and private agencies have assisted the City in developing a ten-year plan to impact homelessness, **Welcome Home Billings**. Local organizations that provide housing, health services, and social services have been intricately involved in planning processes for the homeless and chronically homeless, including members of the *Mayor's Committee on Homelessness* and the *Billings Area Resource Network*. The City does not receive Housing Opportunities for Persons with AIDS (HOPWA) funding directly, but collaborates with the *Yellowstone AIDS Project* to implement goals and objectives to support HOPWA funding.

Adjacent Governments

91.100(a)(4)

Communication regarding non-housing community development needs is conducted via collaboration through homeless initiatives and agencies serving the disabled. Adjacent governments include: the State Department of Public Health and Human Services; homeless presentation regarding the City's ten-year plan to impact homelessness, *Welcome Home Billings*, to the Yellowstone County Commissioners; and

communication and recommendations to the State Continuum of Care coordination group. Collaboration regarding economic development initiatives includes communication with the Big Sky Economic Development Authority, the Native American Development Corporation and other development agencies.

Metropolitan Planning

91.100(a)(5)

The City of Billings - Community Development Division is included in the Planning and Community Services Department. The Department, overall, includes Code Enforcement, Planning / Transportation (includes the City of Billings and Yellowstone County), and the Building Division. These Divisions work internally to implement the Growth Policy, Transportation Plan and Neighborhood Plans collectively. All projects are reviewed for residential access to public transportation.

Public Housing

91.100(c)

The Housing Authority of Billings (HAB) is primarily responsible for administration of the public housing and Section 8 Programs for the community. HAB will continue to work on developing additional units of low-income housing in Billings. HAB is an independent organization established under the laws of the State of Montana. Board members for HAB are appointed by the Mayor for the City of Billings. The City enjoys a cooperative and collaborative relationship with HAB, including participation in task forces, committees, and affordable housing development.

Shelter Plus Care, Single Room Occupancy and Supportive Housing Program funding amounts are not included in the City's Action Plan, as the funds are not available for allocation through the City's Consolidated Plan process. Funding allocated to the Housing Authority of Billings is contained in their Annual Action Plan and the City is not duplicating the reporting requirements that already exist in the Public Housing Agency Plan.

The City has provided \$923,850 in CDBG and HOME funding from 1996 to 2011 to support affordable housing, including: family self-sufficiency; tenant-based rental assistance; low income area infrastructure; and affordable housing development. The City does not have adequate federal funding resources to allocate to the HAB this fiscal year.

Citizen Participation Plan

91.105

The City's Citizen Participation Plan is designed to ensure citizen involvement in the planning and reporting on programs covered under the HUD Consolidated and Annual Action Plan requirements. The purpose of the Citizen Participation Plan is to ensure that citizens, nonprofit organizations, and other interested parties are afforded adequate opportunity to review and comment on plans, programs, activities and reports regarding the City's federally funded housing and community development programs.

Citizen Participation Plan Objectives

The primary objectives of the City's Consolidated and Citizen Participation Plans are to:

- Encourage citizen participation in the development of the Consolidated Plan and the Comprehensive Annual Performance and Evaluation Report (CAPER) with emphasis on participation from individuals and households identified as low to moderate income, residents of blighted areas, minorities, those with limited English proficiency, the disabled, female-headed households and those residing in areas where funding will be utilized.
- Provide citizens with reasonable and timely access to meetings, information and records relating to the City's plan for utilizing funding in addition to allowing reasonable opportunity to comment on the Consolidated Plan, the Citizen Participation Plan and the CAPER.
- Finalize consultation with the Housing Authority of Billings (HAB) on the development and implementation of the Consolidated Plan through the Annual Action Plan, which includes input from residents of public and assisted housing.
- Provide technical assistance to neighborhood task forces which represent the low to moderate income and the highest concentrations of minority populations in Billings.
- Provide public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program. All hearings and meetings shall be provided in areas where accommodations for the disabled can be provided.

Community Development Board

The Community Development Board is a citizen's advisory board consisting of nine members who are appointed by the Mayor of Billings with the consent of the City Council. Six members are appointed from lower-income neighborhoods of the City as defined by federal regulations for the Community Development Block Grant (CDBG) program and three members represent the community at large. This board serves in an advisory capacity to the City Council for the purpose of providing citizen input on policy decisions to the City Council. The primary responsibilities of the board are to review existing and proposed City policies and to review the Community Development Division's activities to ensure policies are being implemented and carried out.

The Community Development Board makes recommendations to the City Council regarding the Consolidated Plan, the Annual Action Plan, the Citizen Participation Plan, and the CAPER. In addition, the Community Development Board reviews applications submitted for CDBG and HOME funding in order to make funding recommendations to the City Council for approval.

Billings City Council

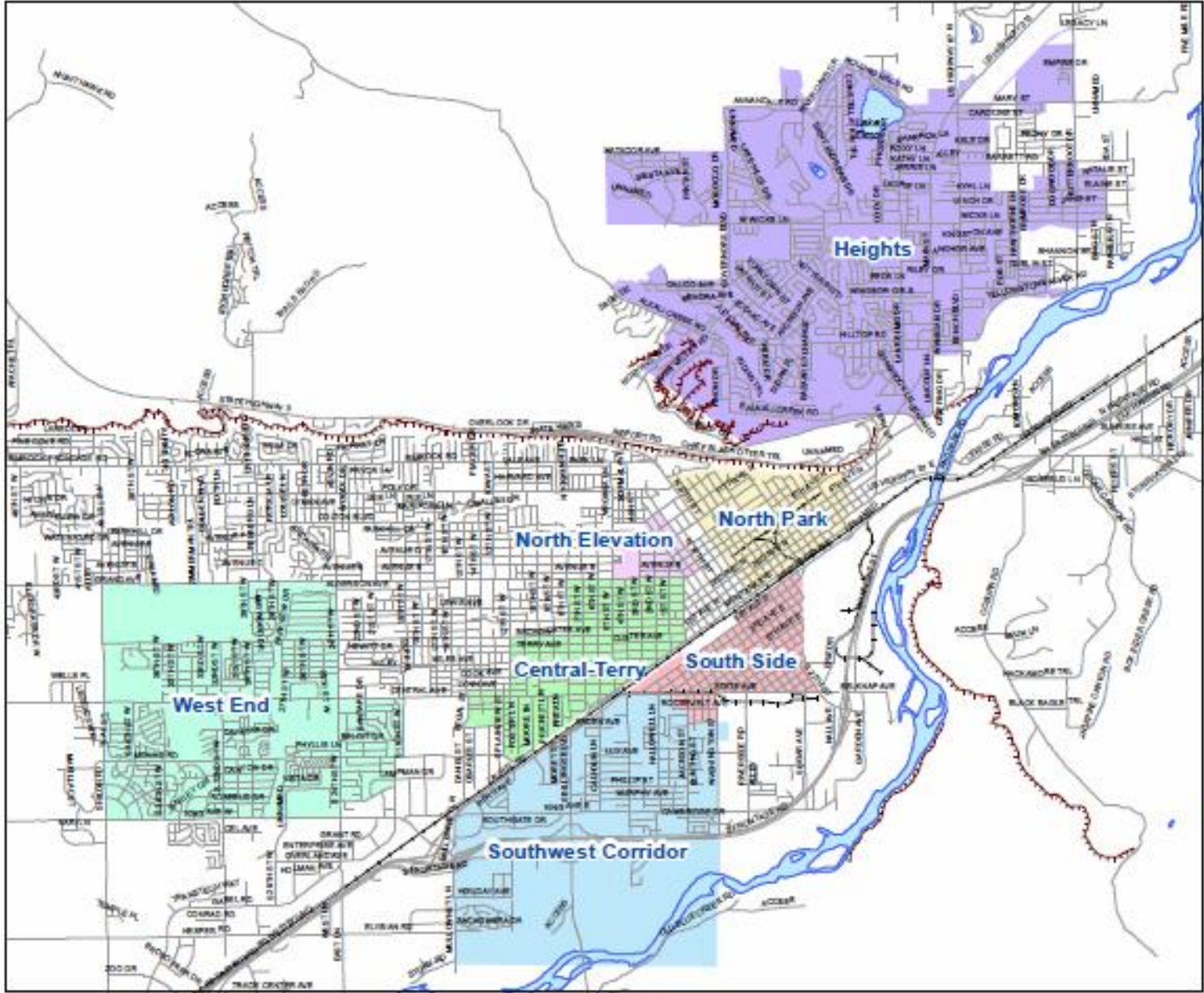
The Billings City Council is the final citizen policy body that reviews and takes action on the Annual Action Plan, including the Citizen Participation Plan. The Community Development Board presents recommendations to the City Council during a scheduled work session preceding the public hearing in April in order to deliver information on decisions made regarding recommendations. After receipt and consideration of public comments, the City Council approves the Annual Action Plan and proposed funding allocations. Following approval in May, the Annual Action Plan is forwarded to HUD.

Neighborhood Task Forces Representing Low-Income, Minority & Female-Headed Households

In order to encourage citizen participation emphasizing the involvement of lower-income residents in areas where housing and community development funds may be spent, the City will continue to work with neighborhood organizations representing the City's lower-income areas. These areas are predominantly illustrated as established task force areas in Billings. A map of the City's neighborhood task force areas is located on the following page.

The City will continue to work with neighborhood task forces that represent the community's lower-income areas to ensure input from these areas in the development and implementation of the City's community development strategies as described in the Consolidated Plan. The City will also continue to support the activities for the Adjacent Neighborhood Committee, which is comprised of task force officers who meet bi-monthly to collaborate and exchange information regarding the task force areas. The Community Development Division will continue to request project rankings from task force participants on housing and neighborhood activities for the annual allocation process.

The Community Development Division staff attends meetings of lower-income task force neighborhoods when requested for specific presentations. Staff also provides information regarding housing and community development programs and activities during each allocation process and garners rankings of housing / neighborhood activities preferred for funding.



Participation through Partnerships

The Community Development Division's vision is to act as a catalyst for joining community partners with resources to increase access to housing, to create a sustainable community and to promote neighborhood revitalization. The Division's mission focuses on striving to exceed the expectations of our stakeholders by supporting housing and community partners with quality leadership, accountability, and innovative programs and services. Guiding values and principles include:

- Embracing diversity and being respectful of all viewpoints.
- Utilizing creativity to develop best practices in programs, administration, and community service.
- Recognizing the City's first responsibility is to low-income individuals who would most benefit from programs.
- Showing integrity as public servants to thoughtfully manage and pursue resources to the benefit of the community.

Establishing and maintaining partnerships with myriad organizations that support the community vision is the keystone to the Division's planning efforts. The Community Development Division supports the following organizations and includes their input throughout the year:

- ***Affordable Housing Task Force*** – The Affordable Housing Task Force is comprised of lenders, realtors, the Housing Authority of Billings (HAB) local housing developers, and other organizations working in housing to ensure coordination and collaboration in identifying needs, undertaking actions to meet those needs, and evaluating activity effectiveness. The vision of the group is to successfully identify the housing needs of the community and provide expertise and innovative solutions to ensure attainable housing for all. Their mission is to work as a positive voice coordinating action, and organizing and energizing efforts to promote affordable housing in the Billings area.
- ***Billings Partners for American Indian Homeownership*** – The Billings Partners for American Indian Homeownership (BPAIH) was formed in order to provide an organized approach to outreach and education for American Indians who would like to purchase a home. This group has identified a 26% American Indian homeownership rate compared to 67% for whites and 45% for blacks and Hispanics. Their vision is to increase American Indian private homeownership in the greater Billings community. This organization is comprised of lenders, realtors, housing organizations, credit counseling organizations, Indian Health Service, Yellowstone County Extension Office, and others.
- ***Mayor's Committee on Homelessness*** - The Mayor's Committee began meeting in June 2006 following Mayor Tussing's charge to develop a 10-Year Plan to address the needs of the chronically homeless in Billings. The development of this plan was part of a national movement to change the way in which communities address homelessness and was the first of its kind in Montana. To date, over 300 cities across the nation have committed to implementing 10-Year Plans to impact chronic homelessness. The Mayor's Committee includes representation from a broad stakeholder group including housing / service providers, civic / business leaders, economic / work force agencies, faith based / philanthropy groups, and other interested parties.
- ***Fair Housing Organizations*** – The City actively partners with organizations with an interest in fair housing. In May 2004, the City Council required City staff to facilitate fair housing efforts via competitive processes in order to ensure equal access for organizations with an interest in fair housing. City staff has facilitated several grant applications for the Fair Housing Initiative

Program (FHIP) available competitively through HUD and was awarded grant funding in 2006, 2007, 2008 and 2011. Continuing the practice of grant writing for fair housing activities this upcoming year is contingent on available staff time. Previous and current partners and Subrecipients of FHIP funding include: Homeward; the Community Housing Resource Board; Interfaith Hospitality Network; the Billings Partners for American Indian Homeownership; Rimrock Foundation; Yellowstone AIDS Project; and Yellowstone County Council on Aging in Billings.

Racial / Minority / Female-Headed Household Participation

Actions taken to establish and oversee a minority outreach program to ensure inclusion of minorities and women, entities owned by minorities and women, including real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, and underwriters in all contracts is accomplished by the following:

- Facilitating the *Billings Partners for American Indian Homeownership*; a group of lenders, realtors and affordable housing professionals with an interest in increasing minority homeownership opportunities.
- Facilitating the *Affordable Housing Task Force*; a group of lenders, realtors and affordable housing professionals with an interest in affordable housing maintenance and development.
- Maintaining a current email distribution list for the lending community and the real estate community at large in the Billings area, including women, low income individuals, minorities, and female-headed households.
- Contract opportunities for contracts are emailed to :
 - Chairpersons for the neighborhood task forces, which cover both low income areas and higher concentrations of minority residents, including female-headed households. The City's most concentrated minority populations are located in the Southside, Southwest Corridor, North Park, North Elevation, and Central – Terry Park task force neighborhoods.
 - Housing Authority of Billings to post for residents utilizing public assistance, also a higher female headed-household and minority population.
 - Members of the Mayor's Committee on Homelessness and the Billings Area Resource Network, representing social service providers serving high concentrations of low-income, female-headed and minority households.
- Annual advertisement for contractor opportunities in construction in publications distributed to low-income, and minority and female-headed households.

For additional information on standard practices, please refer to the City's comprehensive [Section 3 procedures](#), available online.

Persons with Disabilities & Reasonable Accommodation

The City provides accommodations for individuals with disabilities in public meetings, public hearings and in written documentation regarding programs and services available from the Division. Statements are included in notices of public hearings and service brochures indicating that office and hearing locations are accessible to persons with disabilities. Accommodations can be made for other disabilities as well.

Limited English Proficiency & Language Assistance Plan

The City complies with federal regulations regarding the provision of a Language Assistance Plan in order to adequately provide for the needs of those individuals who have self-identified a primary language which is not English. Statements are included in notices of public hearings and service brochures regarding the availability of language interpretation for those requiring this accommodation. The full Language Assistance Plan is located in the Appendices.

Technical Assistance

The Community Development Division provides technical assistance as requested and as staff time allows to lower income groups to develop proposals for housing and community development activities in the City limits. The technical assistance is offered any time proposals for the use of funding are requested, and is offered routinely in January prior to application deadlines for CDBG / HOME funding allocations.

Public Involvement & Consolidated Plan Review

Citizen participation is the foundation of housing and community development programs. Reasonable efforts are made to make all citizens aware of public hearing and citywide events concerning the development of the Annual Action Plan.

City Council agendas covering housing and community development programs are made available to the public as required by Montana State Law. The City follows State Law governing advertising of public hearings required for CDBG and HOME activities. The City is required to advertise the public hearing on two consecutive Thursdays prior to the City Council Meeting on Monday or Tuesday in the event of a holiday.

Plans and reports on the City's housing and community development activities are made available for review by citizens, public agencies, and other interested parties. These documents are available at the Community Development Division and posted on its website at www.ci.billings.mt.us. All records regarding these activities are maintained according to the City Record Retention Schedule and as required by federal regulations.

Public Hearings

The City holds public hearings each year regarding housing and community development activities. A public hearing is held by the City Council in April to provide nonprofit agencies, organizations, and individuals with an opportunity to provide input on the Consolidated / Annual Action Plan and the allocation of CDBG and HOME funds in the community. A second public hearing is held by the City

Council in September to gather public input on the City's performance and progress in meeting the strategies included in the City's Five-Year Consolidated Plan and Annual Action Plan for the previous fiscal year ending each June 30th. All public hearings are accessible to disabled individuals, publicized as required by State law and allow for accommodation of individuals with hearing, visual, or mobility impairments.

Report & Plan Availability

The availability of the reports and plans required under the Consolidated Plan is published in the local newspaper with complete copies available on the internet at www.ci.billings.mt.us and at the City's Community Development Division. The public notice describes the contents and purpose of each document including the location at which the complete plan can be examined. Subrecipients, housing partners, and neighborhood task force chairpersons are contacted regarding the availability of the information described above.

A summary of the plan development process and public comments received during this process will be included in final version of the Consolidated Plan, Annual Action Plans, and Comprehensive Annual Performance and Evaluation Report submitted to the U.S. Department of Housing and Urban Development. The Community Development Division office is located at the Parmlly Billings Library, 4th Floor, 510 North Broadway, Billings, Montana 59101 and has office hours Monday through Friday, 8:00am to 5:00pm.

Public Comments

Public comments are requested at least 30 days prior to submission of reports required under HUD's Consolidated Plan process. The City will consider all written comments by citizens, public agencies and other interested parties prior to submission of its final Consolidated Plan and related reports to HUD and attach a summary of each comment to the final submission. If written comments are not accepted for inclusion in the Plan, the City will provide written explanation of why those comments were not accepted.

The City provides written responses to all written complaints and grievances related to the Consolidated Plan requirement and the City's housing and community development programs within 15 working days of receipt of the complaint or grievance where practical.

For the purposes of reviewing the Annual Action Plan, a public hearing was held on April 22, 2013 6:30pm (advertised March 21 and April 4, 2013)

The public comment period was held from March 22 through April 22, 2013, and the Consolidated Plan was available online at www.ci.billings.mt.us/conplan. Public comments submitted for the Annual Action Plan include the following as stated in the Public Hearing during the City Council meeting:

- **Name:** Comment
- **Name:** Comment

There were no other speakers, and the public hearing was closed. City Council member comment includes the following:

- **Councilmember Name:** Comment

- **Councilmember Name:** Comment

Criteria for Amending the Consolidated Plan / Annual Action Plans

24 CFR part 91.105(c) of the Final Rule requires grantees of CDBG and HOME programs make public the criteria the City will use for determining what changes in planned or actual activities constitute a substantial amendment to the Five-Year Consolidated Plan / Annual Action Plans. An amendment to the approved plan will occur when the City of Billings decides:

- Not to carry out a project or activity described in the plan.
- To carry out a project not previously described.
- Substantially change the purpose or scope of a project.

Prior to the submission of any substantial change in the proposed use of federal housing and community development funds, the City of Billings will hold a public hearing to allow citizens reasonable notice of, and opportunity to comment on, proposed amendments. Public comment periods will not be less than thirty (30) days.

Substantial changes are defined as the creation of any new budget line item to be funded under the City's HOME and CDBG programs, or a budget amendment resulting in an increase or decrease in a previously approved line item of more than \$25,000.

DRAFT

SECTION THREE - Strategies & Compliance

Overall Strategies

This section combines overall strategies and regulatory references for Consolidated Plans in one area for ease of reference. Federal regulations accompany all federal funding allocations and all activities / projects funded through the Community Development Division's CDBG and HOME programs.

Institutional Structure

91.215(k)(l)

As previously mentioned, the City's dedication to partnerships and inclusive participation contributes to the community's ability to meet overall community development goals. The Community Development Division is committed to assisting in capacity-building efforts for local nonprofit organizations and local partners in order to build a stronger community, and will continue to act as a catalyst to bridge the gaps between resources and organizations that can meet community need through housing development, social services and economic development.

Other organizations involved with housing and community development in Billings include:

- **Neighborhood Groups:** South Side Neighborhood Task Force, North Park Task Force, Central-Terry Park Neighborhood Task Force, North Elevation Task Force, Southwest Corridor Task Force, West End Task Force, and the Heights Community Development Task Force.
- **Economic Development Organizations:** Downtown Billings Alliance, Big Sky Economic Development Authority, and Beartooth Resource Conservation and Development Council.
- **Government Agencies:** Montana Board of Housing, the Montana Department of Commerce, and Yellowstone County.
- **Nonprofits:** Montana Homeownership Network, Homeward, Community Leadership Development, Montana Rescue Mission, Family Service, Inc., Community Housing Resource Board, Habitat for Humanity, Yellowstone AIDS Project, Living Independently for Today and Tomorrow, and Rebuilding Together.
- **Private Sector:** Local Lending Institutions, Federal Home Loan Bank, Property Managers Association, Montana Landlords Association, Eastern Montana Landlords Association, and the Realtors and Home Builders Association.
- **Advisory groups:** Affordable Housing Task Force, Adjacent Neighborhood Committee, and the Billings Partners for American Indian Home Ownership.

Economic development strategies in the community are primarily served through the Big Sky Economic Development Authority. Strengths of the current delivery system, including public housing, include the immense collaboration the City facilitates in Consolidated Plan development and implementation. Gaps in the current system can be met with increased funding allocated through the entitlement processes.

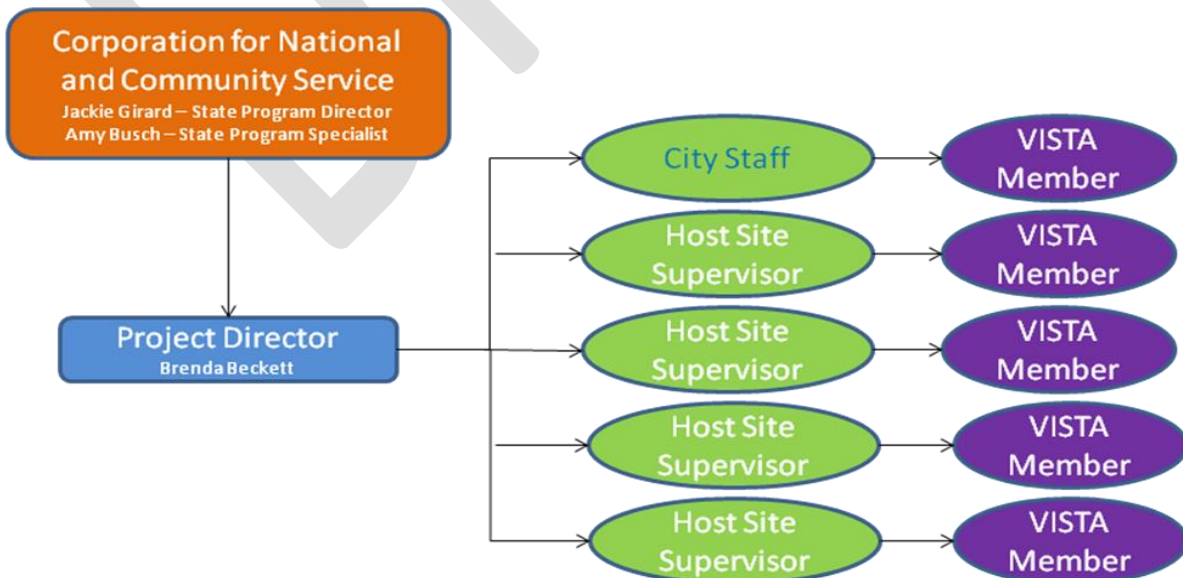
The Housing Needs Assessment contains comprehensive information on the lower income status of local households. Current findings indicate a need to address economic conditions locally and in the State of Montana in a comprehensive manner.

The Consolidated Plan strategies target the improvement of economic conditions of lower income households (as defined by the IRS determination of Adjusted Gross Income) in the community, including housing development, financing home repair, continuing partnerships and funding public service activities. The City’s strategies to promote affordable housing and fair housing city-wide, and to preserve the existing housing stock and the neighborhoods where the affordable housing stock is located, will compliment economic development efforts by providing safe, decent, and affordable housing and livable neighborhoods for lower income households in our community.

The City proposes to support statewide efforts to improve economic conditions and proposes to support the following specific activities in this Consolidated Plan to address economic conditions of low and moderate-income households in Billings:

- Continue to work with nonprofit organizations to help address the human service needs of lower income residents of the community in general and of our lower income neighborhoods in particular. This would be achieved primarily through funding of social service agencies as public service activities under the CDBG Program. (Strategy E)
- Continue to support the work of local economic development organizations to help create higher wage jobs for lower income persons. (Strategy C)
- Continue to apply for the **AmeriCorps VISTA (Volunteers in Service to America)** project status in order to bring full-time volunteers to work on capacity-building for the homeless initiatives through **Welcome Home Billings**, the City’s ten-year plan to impact homelessness. The City was awarded project status and placed seven VISTA members to work on poverty issues beginning in July 2009. The structure of the **Billings Metro VISTA Project (MVP)** serves to build the capacity of nonprofit organizations to work on poverty issues. (Strategy C)

Billings Metro VISTA Project (MVP) Model



Regulatory Compliance

The following sections reference regulatory compliance issues for all projects and activities undertaken by the City with CDBG and HOME funding. Statements made herein are subject to change for the HOME program, as HUD published a significant [proposed regulation](#) in December 2011. Programmatic changes are intended to enhance performance and accountability, and to clarify existing regulatory provisions.

Environmental Review

The Community Development Division staff is fully trained in current Environmental Review Records procedures. The City utilizes multi-year review processes to accommodate environmental review for core programs including housing repair, planning activities, and down payment assistance programs. The City reviews each project for environmental clearance prior to securing funding.

Lead-Based Paint

91.215 (i)

The City continues to be in compliance with HUD's lead-based paint requirements as established in September of 2000. According to the American Community Survey estimates from 2007-2011, it is estimated that there are over 29,317 housing units built before 1979 that are at risk of containing lead-based paint, which comprises 64% of the total housing stock in Billings. Not all of the homes built prior to 1979 contain lead-based paint and lead hazards. However, projects involving structures built prior to 1978 are considered to have the potential for lead-based paint and consistent procedures have been developed to ensure compliance with federal regulations.

In 2012, the Center for Disease Control recommended action for children with elevated levels greater than or equal to 5 ug/dL. The Montana Department of Public Health and Human Services cited a [2012 field study](#) conducted in 11 counties in the state. Children enrolled in Medicaid aged one to five years were tested for elevated blood lead levels. Nearly 600 children participated in the study, and 3% of the children had levels ≥ 5 ug/dL. One in four of the children tested had ≥ 1 ug/dL.

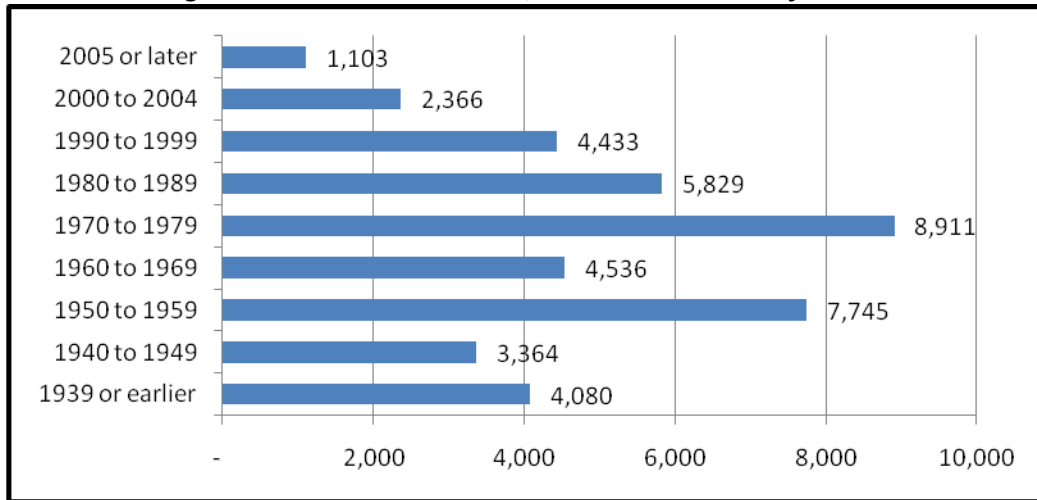
The City will continue diligence while undertaking rehabilitation and construction activities in order to maintain the safety of households participating in federal programs. Participants in the City's housing programs are made aware of the requirements the City must follow when providing assistance. Education on the hazards of exposure to lead is provided for each rehabilitation project. The City currently offers risk assessments, through certified staff, paint inspections, clearance testing, and has access to lead-safe certified contractors to ensure compliance.

In addition, the City also promotes lead-safe work practices training whenever it is offered in Montana, which gives local contractors the opportunity to become certified in lead-safe work methods. The City will continue to maintain working relationships and partner in furthering educational efforts with lead-based paint professionals to ensure HUD requirements are effectively met.

Historic Review

All activities and projects undertaken by the City are reviewed for the potential for historic significance prior to implementation. Approximately 15,000 homes in the City were built prior to 1959. These homes are more than 50 years old and require historic review to ensure the historic value of the property will be maintained while undergoing housing rehabilitation utilizing federal funding.

Billings - Year Structure was Built, Shown in Numbers of Structures



Source: U.S. Census Bureau, 2006-2008 American Community Survey Three-Year Estimates

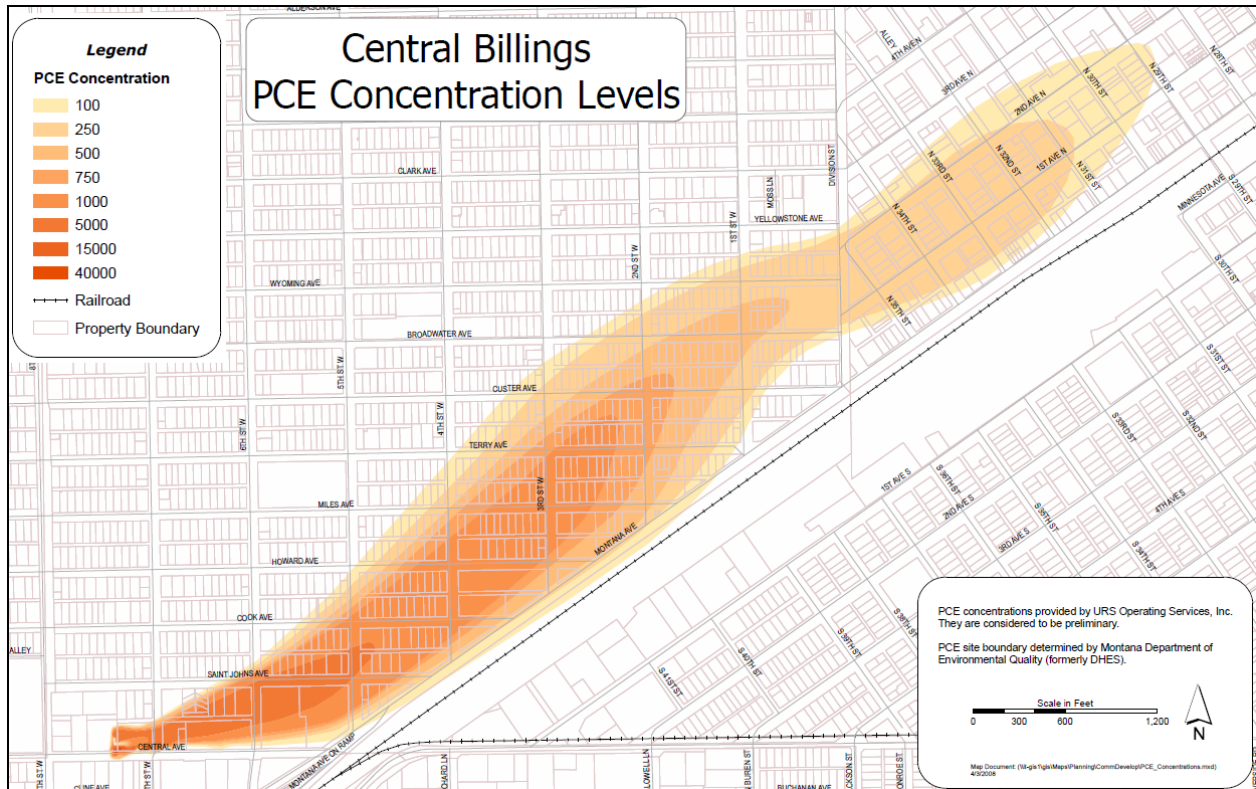
The City utilizes both the Yellowstone Historic Preservation Board and the State Historic Preservation Office to review projects for potential impacts on historic integrity prior to implementation.

PCE Groundwater Contamination Site

The Environmental Protection Agency (EPA) has identified an area in the City limits with Perchloroethylene (PCE) groundwater contamination. This is a man-made chemical used for dry cleaning and degreasing metal parts. The EPA has finalized remediation in this area and has notified, tested, and remediated the high level PCE properties in the area (see map, following page).

The groundwater in this area is not potable; however, all of the residences / businesses in the area have established access to the City water system and do not rely on groundwater for drinking. The predominant issue when reviewing properties in this area for housing rehabilitation is exposure to soils in basements, active groundwater well systems and adequate ventilation.

The City has developed site-specific environmental review procedures in collaboration with the EPA and the procedures have been reviewed and approved by HUD. Properties in this area will be reviewed for open well systems, exposure to soil and adequate ventilation. Work lists containing remedies to address these issues are a priority for all properties located in the PCE area.



Location of PCE Site in Billings

Fair Housing & Equal Opportunity

The City has completed an [Analysis of Impediments to Fair Housing Choice](#) (AI) study every five years since the 1990s. The Community Development Division staff is dedicated to supporting fair housing efforts and initiatives in Billings. This includes ensuring that activities, projects and programs funded utilizing CDBG and HOME funding are carried out without discrimination, directly or indirectly, on the basis of race, color, religion, gender, national origin, age, familial status, disability, creed, sexual orientation, and gender identity.

Primary Planning Tool: The City utilizes the AI as a primary planning tool to develop strategies and activities for the Consolidated Plan, as illustrated in the identified Action Plan activities in the Annual Objectives and Tables section. The most recent AI was completed in March 2013 by Planning / Communications. The following impediments have been identified:

1. Concentrations of minorities that would not exist in a free market not distorted by discrimination suggest that Billings has a dual housing market, one for non-Hispanics whites and Asians, and another for all other minorities.
2. Discriminatory real estate industry practices such as racial and ethnic steering distort the free market in housing.
3. Discrimination against Latinos in issuing government-backed mortgage and refinancing loans continues unabated in Billings as it does throughout the nation.

4. The relatively high cost of housing continues to pose a barrier to fair housing choice in Billings by fostering economic concentrations and the racial and ethnic concentrations that accompany economic concentrations due to the median income of Billings' Native American and Hispanic residents being less than its non-Hispanic white households.
5. When revising its comprehensive plan and neighborhood plans, the City of Billings should explicitly address how to reduce existing economic and racial/ethnic concentrations and foster socio-economic diversity throughout the city.
6. Billings' planning process does not directly address fair housing issues that the city can help resolve and fair housing violations that the city can help prevent. Residential developments that require city review and approval are approved without any requirements to promote compliance with the Fair Housing Act, the Montana Human Rights Act, or the accessibility requirements of the Americans with Disabilities Act.
7. Billings' Unified Zoning Regulations impermissibly treat community residences for more than eight people with disabilities differently than other families including smaller community residences.
8. Billings' Unified Zoning Regulations limit housing occupancy to two occupants per bedroom in a dwelling unit.
9. Billings' Unified Zoning Regulations do not permit accessory dwelling units; a cost-effective way to provide housing affordable to individuals and households of modest means that also enables families with declining incomes to remain in their homes.
10. Allowing townhouse development only via special review and excluding townhouses completely from the R-96 district imposes significant barriers to the construction of this more affordable form of housing.
11. The 40-foot height limit in the Residential Multi-Family District creates a barrier to construction of additional affordable housing.
12. Billings' Unified Zoning Regulations do not allow small lot or cottage-style development of clustered single-family detached homes.
13. There continues to be a serious shortage of housing affordable to holders of Housing Choice Vouchers in the areas of Billings where the proportion of public school students from lower-income households is relatively low.

Consolidated Planning: The following recommendations have been offered as suggestions to begin to address impediments over the next five years:

1. City Council adopts goal and policy to promote the expansion of housing choice throughout the city.
2. Work to expand housing choices of existing and potential new residents beyond the neighborhoods identified by their own race or ethnicity.
3. Conduct on-going educational publicity campaign to make people aware they can move anywhere in the area they can afford.
4. Arrange for ongoing, systematic, and thorough testing of real estate industry practitioners to identify discriminatory practices in rental and for sale housing.
5. Provide counseling, especially to Latinos, before they apply for a mortgage.

6. Amend the zoning code to:
 - a. Require that no less than 20 percent of the units in all residential developments of five or more dwelling units be affordable to households with modest incomes. In exchange, the zoning ordinance should give the developer a 20 percent density bonus so that the developer makes at least as much profit as if this requirement were not in effect.
 - b. Adopt inclusionary zoning that gives the Housing Authority of Billings priority to purchase inclusionary units.
7. Amend Billings' comprehensive plan and neighborhood plans to explicitly establish a comprehensive approach with goals, objectives, policies, and implementation tools to achieve stable, socio-economically diverse neighborhoods throughout Billings.
8. Require developers to agree to affirmatively market develop to all racial and ethnic groups to receive zoning or subdivision approval.
9. Require that billboard advertising reflect full diversity of Billings to receive zoning or subdivision approval.
10. Require developer and sales agents to distribute brochure to all clients that clearly identifies illegal discriminatory practices and provides clear contact information to file a fair housing complaint.
11. Require for subdivision and zoning approval agreement to include the Fair Housing logo and/or phrase "Equal Opportunity Housing" and contact information for filing a housing discrimination claim.
12. Get local newspapers and magazines to public housing discrimination notice in sections with real estate advertising.
13. Amend the Unified Zoning Regulations to treat these uses the same as other families: community residences for more than eight people with disabilities, and these residences for people with disabilities: "community residential facilities not providing care on a 24 hour-a-day basis," "rehabilitative centers" that house people with disabilities, adult foster family care homes, halfway houses, youth foster homes, and youth group homes.
14. Amend the Unified Zoning Regulations to replace the two occupants per bedroom limitation with one based on the square footage of each bedroom.
15. Amend the Unified Zoning Regulations to allow accessory dwellings in as many residential zoning districts as practical, particularly the districts with the largest minimum lot sizes.
16. Amend the Unified Zoning Regulations to allow townhouses in the R-96 district.
17. Establish a new zoning district in which townhouses are among the residential uses allowed as of right, or amend the Unified Zoning Regulations to allow townhouses as a permitted use in one or more zoning districts where there is a significant amount of land available for new residential development.
18. Amend the Unified Zoning Regulations to allow a greater height in the Residential Multi Family district.
19. Research amending the Unified Zoning Regulations to enable development of small lot cottage-style, clustered single-family detached homes. The city should carefully examine its maximum lot coverage restrictions to remove barriers to this type of housing.

20. The Unified Zoning Regulations should be amended to require that no less than 20 percent of the dwelling units in new residential developments of five or more units be affordable to households with modest incomes and that the Housing Authority of Billings be allowed to purchase up to one-third of the inclusionary units.
21. Schools should adopt and implement a policy to achieve economic diversity in all of its schools so that every school has a strong middle class population with at least a majority of pupils in each school coming from households with middle-class or higher income families.
22. The Housing Authority of Billings should expand the geographic range of housing choices that holders of Housing Choice Vouchers consider.
23. The Housing Authority of Billings can take steps now to expand the geographic range where holders of Housing Choice Vouchers will look for housing.

Affirmatively Furthering Fair Housing: City staff commits to continuing the following efforts to affirmatively further fair housing during this fiscal year, such as:

- Meet with City staff from other departments, stakeholders and organizations with an interest in fair housing regarding recommendations to begin the process of prioritizing and isolating all that can be done this fiscal year.
- Base program development strategies on activities to ensure diversity and benefit across the city, which also assists in avoiding segregation.
 - Ensure all housing repair, development, and acquisition activities are based on program parameters allowing city-wide implementation to avoid segregation.
- Staff facilitation and administration of fair housing initiatives.
- Facilitate capacity-building efforts for local non-profit organizations with an interest in fair housing.
- Facilitate specific grant-writing activities to further local educational efforts, when staff time allows.
- Promote fair housing choice for all persons.
- Work to alleviate housing discrimination in Billings.
- Promote housing that is accessible / usable by persons with disabilities.
- Provide opportunities for all persons to live in any given housing development.
- Continue to notify participants, beneficiaries, applicants and employees, including those with impaired vision and / or hearing and members of collective bargaining agreements, that the City does not discriminate on the basis of race, color, National Origin, Disability, Handicap, Familial Status, Sex, Religion, Creed, Marital Status, Age, Sexual Orientation, or Gender Identity.
- Report on efforts taken to further fair housing in the Comprehensive Annual Performance Evaluation Report, found [online](#).

Fair Housing Initiatives Program (FHIP): The City actively partners with organizations with an interest in fair housing and has facilitated several grant applications for the FHIP grant available competitively through HUD. The City was awarded this grant in 2006 for over \$93,000. In 2007 and 2008, grant awards were made for over \$99,000 for each year. In 2011-2012, the City was awarded another \$125,000 to further fair housing education and outreach and completed over 40 activities in April 2012. Previous and

current partners and Subrecipients of FHIP funding include: Homeward; the Community Housing Resource Board; Interfaith Hospitality Network; the Billings Partners for American Indian Homeownership; Rimrock Foundation; Self Help Law Center; Yellowstone AIDS Project; and Yellowstone County Council on Aging in Billings.

From May 1, 2011 to April 30, 2012, City staff addressed urgent needs identified in this underserved area by partnering with several non-profit and community representation organizations to build capacity and expand the professional knowledge base regarding fair housing issues. Partnering organizations assisted in building a comprehensive community-based response to pressing fair housing needs, including targeting: American Indians and other minority groups; the disabled - particularly those in recovery from addiction or individuals who have been diagnosed with HIV / AIDS; homeless families; and people experiencing poverty. Impediments these individuals face include segregation, steering, blatant discrimination, hostility, and disparate treatment when applying for housing during the rental application process and also when applying for housing financing.

Staff will analyze the City's ability to apply for and carry out an additional FHIP grant during this fiscal year. Staff members also review policies, procedures and service outcomes on an annual basis through the Consolidated Plan and performance reporting processes to determine whether impediments to fair housing choice were inadvertently imposed. Plans for future actions are implemented to address concerns during the fiscal year allocation process.

Affirmative Marketing

The City adheres to an Affirmative Marketing Procedure which furthers the City's commitment to nondiscrimination and equal opportunity in housing. Proposed affordable housing development projects with more than five units are required to submit an Affirmative Marketing Plan with the application for funding. The plan includes procedures for marketing units to minority / disabled populations and performing significant outreach to ensure equal housing opportunity for potential renters / owners of the housing units. The City's complete Affirmative Marketing Plan is located in the Appendices.

To further carry out the intentions of the City's affirmative marketing practices, core programs (such as housing repair, down payment assistance, and special assessment grants) are communicated directly with neighborhood task force chairpersons, who distribute the information in predominantly low income and high-minority concentration areas. Core programs are also marketed to agencies serving the elderly, disabled and those experiencing homelessness.

The Citizen Participation Plan ensures comprehensive public notices and opportunities to solicit and receive public comment and participation in the allocation process. This process includes staff attendance at local neighborhood task force meetings during the allocation process. These areas have been identified with high minority densities and are predominantly low-income.

Section 504

The City operates its federally assisted programs and activities in a manner ensuring accessibility and usability by individuals with disabilities. The City continues to notify program participants, beneficiaries, applicants, and employees that the City does not discriminate on the basis of handicap in admission or access to, or treatment or employment in, federally assisted programs and activities. The Human

Resources Department is responsible for notifications to employment applicants, collective bargaining units and current employees. Contact information can be found [online](#).

Minimum accessibility requirements in accordance with Uniform Federal Accessibility Standards (UFAS) are mandated with all affordable housing projects developed utilizing federal funding. This standard ensures at least 2% of the total number of dwelling units in new construction multifamily complexes is accessible for persons with visual or hearing impairments. If the City funds a project with substantial alterations costing 75% or more of the replacement cost of a completed facility, the City applies new construction provisions. For federally assisted housing in developments constructed prior to July 11, 1988, the City ensures the housing complies with the Section 504 accessibility requirements using UFAS as the design and construction standard to the maximum extent practicable.

Subrecipients of federal funding are all monitored for Section 504 accessibility requirements pursuant to ensure that non-dwelling service facilities are fully accessible to those with disabilities. All Subrecipients are provided a copy of the Self-Evaluation and Assessment of Accessibility to ensure compliance with Section 504 requirements. Brenda Beckett, Community Development Manager, coordinates the Division's Section 504 compliance and can be contacted via phone at 406.657.8286 or email beckettb@ci.billings.mt.us.

Section 3 - Opportunities for Low-Income Individuals & Businesses

Section 3 is a provision of the Housing and Urban Development Act of 1968, which recognizes that HUD funds are typically one of the largest sources of federal funding expended in communities through the form of grants, loans, entitlement allocations and other forms of financial assistance. Section 3 is intended to ensure that when employment or contracting opportunities are generated because a covered project or activity necessitates the employment of additional persons or the awarding of contracts for work, preference must be given to low- and very low-income persons or business concerns residing in the community where the project is located.

Section 3 is both race and gender neutral. The preferences provided under this regulation are based on income-level and location. The Section 3 regulations were designed to encourage recipients of HUD funding to direct new employment and contracting opportunities to low-income residents, and the businesses that employ these persons, within their community regardless of race and / or gender.

The City has a [comprehensive procedure](#) for compliance with Section 3 requirements. This includes procedures to provide job training, employment and contract opportunities for low income residents in connection with projects and activities in their neighborhoods.

Relocation Assistance & Displacement

The City minimizes displacement of persons and assists any persons displaced during the Division's affordable housing and redevelopment activities according to the Uniform Relocation Act. The Uniform Act provides important protections and assistance for people affected by the acquisition, rehabilitation, or demolition of real property for Federal or federally-funded projects.

This law was enacted by Congress to ensure that people whose real property is acquired, or who move as a direct result of projects receiving federal funds, are treated fairly and equitably and receive

assistance in moving from the property they occupy. The Division will require developers to make relocation benefits available to displaced persons during housing initiatives funded with federal dollars.

Short Sales

The term “short sale” can be described as the sale of a property where the sale proceeds fall short of the balance owed on the loan. The City carries liens on properties as a result of owner participation in programs such as First Time Homebuyer and Housing Rehabilitation.

On occasion, the City is asked to participate in “short sales,” which is a process that routinely begins with homeowner that is default on a first-position mortgage. This typically involves a request from a third-party to lower the balance of the lien owed to the City.

Foreclosure proceedings mandate owner protections that can be diluted when a third-party short sale takes place. The City will not participate in any third-party short sale when the City holds an interest in a property. This includes lowering the balance of liens placed when the owner participated in City-financed programs. Short sales initiated by the owner without a third-party will be considered on a case-by-case basis. The City may reconsider this policy with further guidance from HUD in the future.

Labor Standards

The Davis-Bacon Act requires, when applicable, the payment of prevailing wage rates, as determined by the US Department of Labor, to all laborers and mechanics on federally-funded construction projects. As a rule, CDBG construction contracts in excess of \$2,000 will trigger Davis-Bacon, and HOME contracts involving twelve or more HOME units will require Davis-Bacon compliance. Staff will evaluate each application to determine if Davis-Bacon applies to a specific project.

Davis-Bacon Definitions

- **Laborer or mechanic:** Anyone performing construction work on the project, including trade journeymen, apprentices, and trainees. “Laborers” and “mechanics” are the two groups of workers that must be paid not less than Davis-Bacon wage rates.
- **Employee:** Every person who performs the work of a laborer or mechanic is “employed” regardless of any contractual relationship that may exist between a contractor or subcontractor and such person.
- **Apprentices and trainees:** The only workers who can be paid less than the wage rate on the wage decision for their work classification are “apprentices” and “trainees” registered in approved apprenticeship or training programs. Apprentices and trainees are paid wage rates in accordance with the wage schedule in the approved program. The maximum number of apprentices or trainees on the job site cannot be more than the ratio of apprentices or trainees to journeymen allowed in the approved program.
- **Prevailing wages:** Prevailing wages are listed on the wage decision for the project. The wage decision will list a minimum basic hourly rate of pay for each work classification. Wage decisions may include fringe benefits such as health insurance, retirement, vacation and contributions to training funds.

- **Site of work:** The “site of work” is where the Davis-Bacon wage rates apply, usually the boundaries of the project. “Site of work” can also include other adjacent or nearby property used by a contractor or subcontractor in the construction of the project.
- **Proper designation of trade:** A work classification on the wage decision for each worker based on the actual type of work he performed must be done. In addition, each worker must be paid no less than the wage rate on the wage decision for that classification regardless of skill level. The only people who can be paid less than the rate for their craft are apprentices and trainees registered in approved programs.
- **Split-classification:** Employees performing work in more than one classification should be paid the wage rates specified for each classification only if accurate time records showing the time spent in each classification of work are maintained. If accurate time records are not maintained, these employees must be paid the highest wage rate of all of the classifications of work performed.

Wage Decisions: Davis-Bacon wage decisions define the minimum wage payment requirements for classifications such as carpenters, electricians, plumbers, and roofers that work on the project. The geographically specific Davis-Bacon wage decision, provided by the Department of Labor, contains a schedule of work classifications and wage rates to be followed. Wage decisions can be found [online](#).

The prime contractor, or the party ultimately accountable for meeting Federal regulations, is responsible for several key steps in a Davis-Bacon contract. Prior to bidding a construction contract, the Davis-Bacon wage decision must be obtained and included in the bid package. Once the project is underway, a copy of the wage decision and a copy of a Department of Labor "Notice to Employees" at the job site must be posted in a place easily accessible to construction workers employed at the project.

Reporting: A certified payroll report beginning the first week a company works on the project and continuing until the firm has completed its work will be required by the project monitor. The payrolls are certified because each payroll is signed and contains language certifying that the information is true and correct. "No work" payrolls may be submitted whenever there is a temporary break in work on the project.

The prime contractor reviews each subcontractor's payroll reports for compliance prior to submitting the reports to the contract administrator. The prime contractor is responsible for the full compliance of all subcontractors and will be held accountable for any wage restitution found due to any laborer or mechanic that is underpaid and for any liquidated damages that may be assessed for overtime violations.

Every contractor (including subcontractors) must keep a complete set of payrolls and time cards for a Davis-Bacon project for three years after the project is completed. The prime contractor must keep a complete set of all of the payrolls for every contractor for three years after completion of the project.

Compliance Reviews: The contract administrator or other inspector may visit the project site and interview workers concerning their employment on the project. The interviewer will record the interview information and will compare it to payrolls and related submissions to ensure that the labor standards requirements have been met. Additional information on this topic can be found on the Department of Housing and Urban Development [website](#).

Housing Quality Standards

All City projects involving residential construction, rehabilitation, and / or acquisition shall meet the Division's standards to provide decent, safe and sanitary housing that minimally meets or exceeds all applicable local and State codes, rehabilitation standards, ordinances, and zoning ordinances. This includes meeting or exceeding Housing Quality Standards, which will be verified by staff inspection, as the City does not have approved rehabilitation standards. In addition to meeting quality standards, all housing projects undertaken by the City emphasize energy efficiency, universal design, and green building components whenever possible and feasible.

Should the proposed HOME Program rule be formally adopted by HUD, the City is ready to comply with ensuring property standards meet updated requirements.

Housing Rehabilitation Standards

The City operates home repair programs for both traditional and manufactured housing. Federal regulations require rehabilitation standards be defined in the Consolidated Plan.

Definitions

Standard condition dwelling unit: A unit which currently meets *Housing Quality Standards* as described above with no major defects in the structure and only minor maintenance is required. The City of Billings does not currently have a rehabilitation code. Such a dwelling would have the following characteristics post-rehabilitation within the funding limits for each project: a reliable roof; a sound foundation; adequate and stable floors; walls and ceilings; surfaces and woodwork without serious damage or paint deterioration; sound windows / doors; adequate heating, plumbing and electrical systems; adequate insulation, and adequate water and sewer systems. With the exception of emergency rehabilitation, a unit in standard condition would not be eligible for City's housing rehabilitation or home repair funds.

Financially Feasible: A traditionally-built structure that does not require more than \$25,000 to rehabilitate for a single or multi-family unit, which is within the maximum rehabilitation dollar amount for the City's Housing Rehabilitation Loan program. A manufactured home that does not require more than \$10,000 to rehabilitate for a single unit is considered financially feasible. This is the maximum rehabilitation dollar amount for the City's Manufactured Housing Loan program.

Not Financially Feasible: A traditionally-built home that requires more than \$25,000 to rehabilitate for a single or multi-family unit, or a manufactured home that requires more than \$10,000 to rehabilitate for a single unit.

Structurally Feasible: The structure is determined sound and suitable for rehabilitation.

Poor Structural Condition: The unit has a cracked foundation in multiple places, heavy structural damage through expansive soils or other causes.

Substandard Condition Suitable for Rehabilitation: A dwelling unit not meeting the definition of a standard condition dwelling unit as defined above as reflected in the Housing Quality Standard inspection and the City's current housing code, but IS both structurally feasible and financially feasible to rehabilitate. The unit is likely to have deferred maintenance and may have some structural damage such as a leaking roof, deteriorated interior surfaces and inadequate insulation. The unit has other items noted as 'general standards of items that fail' as reflected by the Housing Quality Standard inspection.

Substandard Condition NOT Suitable for Rehabilitation: A dwelling unit in such poor condition that it is neither structurally nor financially feasible to rehabilitate.

Monitoring

The goals to be achieved through the Consolidated Plan will be monitored on a yearly basis as required as part of the Comprehensive Annual Performance Evaluation Report (CAPER) submitted to HUD for the Consolidated Plan. Monitoring consists of:

- Examination of the community's use of available HUD, state, and local resources to meet the affordable housing and community development needs as outlined in the Consolidated Plan.
- Examination of the effectiveness of the programs that are in place.
- Review of public comments received on the community's performance in meeting the affordable housing and community development needs described in the City's Consolidated Plan.

The City funds a variety of Subrecipients to carry out CDBG and HOME funded activities each year. Each of these Subrecipients is required to enter into a detailed sub-recipient agreement that specifically describes funding use.

CDBG Subrecipient Monitoring

Subrecipients will be monitored on-site by Community Development staff at least every other year to ensure compliance with the terms of the agreement and applicable regulations. Site visits will include monitoring in the following areas: compliance with the timeframe of the agreement; rate of expenditures; continued eligibility of the activities under the agreement; and adequate documentation concerning client eligibility and service delivery. Compliance with standard CDBG regulations will also be monitored, including (but not limited to) a review of the following: American Disabilities Act; Fair Housing Act; Equal Employment Opportunity; Section 3 of the Housing and Urban Development Act of 1968; Uniform Administrative Requirements; Davis-Bacon; etc. Inspections are conducted prior to disbursement of CDBG funds and site-visits are conducted to monitor Davis-Bacon compliance during construction. Subrecipients are required to have audits performed pursuant to OMB Circular A-133 and submitted to the City on an annual basis. In addition, Subrecipients are required to submit quarterly / annual reports during the grant period.

HOME Monitoring

The City will monitor the terms and conditions of all agreements made between the City and HOME Subrecipients to ensure compliance with HOME Program requirements, identify information that will allow us to improve our program design and management, and to evaluate how well our programs and projects are achieving desired outcomes. Monitoring elements include: compliance with the timeframe of the agreement; rate of expenditures; eligibility of expenses; adequate documentation regarding the income eligibility of homeowners and tenants; maximum subsidy limits; rents; property maintenance and eligibility; recapture provisions; and affordability periods. Compliance with other HOME regulations will also be monitored, including (but not limited to): Fair Housing and Equal Opportunity; Affirmative Marketing; Americans with Disabilities Act; Davis-Bacon; etc. Inspections are conducted prior to disbursement of HOME funds and site-visits are conducted to monitor Davis-Bacon compliance during construction.

Community Housing Development Organizations (CHDOs)

The City requires CHDOs apply for recertification on an annual basis to ensure continued requirements are being met for CHDO designation, including (but not limited to) maintenance of Board composition,

including at least one-third membership by residents of low-income neighborhoods and no more than one-third may be public officials or local / state employees.

Affordable Housing: Housing projects are monitored via site-visits / inspections on a schedule based on the number of units in the project:

# of Units	Frequency of On-Site Monitoring
1 - 4 Units	Every 3 years
5 - 25 Units	Every 2 years
26+ Units	Every year
Source Documentation	Every 6 years
<i>Staff inspects 15% - 20% of the total HOME units per project, minimum one unit in each building</i>	

City staff will conduct on-site visits that will include Housing Quality Standards (HQS) compliance inspections, tenant file review, household income verification, etc. City staff will also conduct annual desk reviews to ensure leases are in compliance with HOME regulations; rents are compliant with HOME limits; tenant incomes are reviewed annually and they are within eligibility limits; the property owner/manager is inspecting the property at least annually; that adequate project reserves have been established and annual reports are received; and the year-end profit and loss statements show the project is profitable and/or sustainable for the period of affordability.

Timeliness

The City is required to both commit and expend CDBG and HOME funding in a timely manner. The CDBG program mandates that the City carry less than 1.5 times the previous year’s award in the HUD payment system at the beginning of May each year. HOME funding allocated to the City must be committed to specific projects via contract (which must be approved through City Council) within 24 months of allocation and funds must be expended within five years of initial allocation. Failure to comply with commitment and expenditure deadlines will result in funding being recaptured by HUD.

The City must draw down funds at acceptable rates to prevent funding recapture. Therefore, the City will adhere to the following procedures regarding timeliness:

- Allocating funding to grantees that can expend funding expeditiously.
- Prioritizing applications for funding based on timeline for expenditure.
- Reallocating funding from projects that have not expended funds to new projects.
- Draw funding from HUD systems at least quarterly to ensure compliance.
- Perform a timeliness review at the end of each calendar year and plan to move funding to progressive accounts / projects if timeliness will become an issue.
- Work with Community Housing Development Organizations (CHDO) to pre-allocate future mandatory CHDO reserve funding.
- Communicating the importance of timeliness to applicants, the Community Development Board and the City Council.

Performance Measures

HUD requires certain objectives and outcomes be identified for all activities funded through CDBG and HOME. These include objectives for suitable living environment, the provision of decent housing and creating economic opportunities. Outcomes include increasing availability and / or accessibility, affordability and sustainability.

HUD PERFORMANCE MEASUREMENTS	
<i>Objectives</i>	<i>Outcomes</i>
Suitable Living Environment	Availability or Accessibility
Decent Housing	Affordability
Economic Opportunities	Sustainability

In addition to the utilization of HUD standard objectives and outcomes, the City will provide benchmark data on performance and outputs, including the following numbers:

- Housing units assisted
- Years in compliance with stated benchmarks / requirements
- Funding leveraged
- Meetings facilitated by staff
- Grant application submissions to further Consolidated Plan goals
- Strategic / Action Plans generated / implemented
- Organizations supported
- AmeriCorps VISTA members placed

Subsidy Layering

All projects funded through the City with HOME funds that combine other federal funding sources will be reviewed to ensure the project will not use more federal funding than necessary to provide affordable housing. This includes a review of four major components, some requiring documentation and others requiring analysis and review of project details:

- Sources and Uses of Funds Statement
- Certification of Federal Assistance
- Project Development Budget
- Operating Pro-Forma, or Rate of Return on Equity Investment

The City's comprehensive **Subsidy Layering Procedures** are available by request.

HOME Program Recapture Provisions

Recapture provisions permit the original homebuyer to sell the assisted property to any willing buyer during the period of affordability while the City is able to recapture all or a portion of the HOME assistance provided to the original homebuyer. The City utilizes recapture provisions exclusively when assisting homeowners and the provisions are enforced via a Promissory Note (not recorded), the use of a Deed Restriction Agreement and a Montana Trust Indenture that are both recorded at the Yellowstone

County Clerk and Recorder’s office. These written, legal documents contain language outlining the recapture provisions as established herein. The City does not use Subrecipients or other grantees to carry out these activities.

Homebuyer Requirements: In order for homeownership housing to qualify as affordable housing eligible for HOME funding, it must be: single-family; considered modest housing; be acquired by a low income household for their principal residence; and meet affordability requirements for a single period of time as determined by the amount of assistance provided.

Direct HOME Subsidy: The amount of HOME assistance that enabled the homebuyer to buy the unit. The direct subsidy includes down payment and closing costs provided directly to the homebuyer, which resulted in a reduced purchase price from the fair market value of the home to an affordable price. **The entire amount of HOME assistance is subject to recapture.**

Net Proceeds: The sales price, less the superior loan repayment and any closing costs. **The City will only recapture the net proceeds from a sale.** Any loans or improvements made to the property after the time of the HOME assistance will be paid after the City is repaid the amount owed under its recapture provisions. If the net proceeds are not sufficient to recapture the full HOME investment, the City will accept the available net proceeds as full payment.

Recapture Model - City Recaptures Entire HOME Assistance Amount: The City allows the assisted homebuyer to retain all appreciation and the City expects to recapture the entire direct HOME subsidy invested in the project. Therefore, the homeowner will retain any value of the appreciation of the property after the City’s HOME assistance has been recaptured / repaid. The homeowner’s down payment, principal payments, and any capital improvement investment made in the property after the HOME assistance was provided will be returned to the homeowner at closing after the City’s HOME assistance is recaptured and repaid from the net proceeds as described above.

Long Term Affordability: Under the recapture provision, there is no requirement that the original HOME-assisted homebuyer sell the unit to another low-income homebuyer.

Affordability Periods

For City-assisted homebuyer units under the recapture provision, the period of affordability is based upon the direct HOME subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. Any program income used to provide direct assistance to the homebuyer is included when determining the period of affordability. The following table outlines the required minimum affordability periods:

HOME Affordability Periods	
<i>Amount of Direct Subsidy</i>	<i>Period of Affordability</i>
Under \$15,000	5 Years
Between \$15,000 and \$40,000	10 Years
Over \$40,000	15 Years

Recapture provisions for the First Time Homebuyer program are either five or ten years for each assisted property beginning after the transfer of the property to the property owner as evidenced by the Deed Restriction Agreement, Montana Trust Indenture and Promissory Note.

The overall Kings Green Affordable Housing Development project will bring a total of 49 new affordable single-family units to the overall housing stock in Billings. Phases I, II and III resulted in 39 units and Phase IV, which commences this fiscal year, will add an additional 10 units. These units will be subject to recapture provisions. If the HOME funds used to develop the property assist in selling the home below fair market value, the difference between the fair market value and purchase price will be considered a direct benefit attributable to the HOME subsidy.

Subordination

The City does not subordinate loans in the First Time Homebuyer program and other homeowner-assisted projects without City Council approval. Therefore, if an assisted homeowner refinances the property, the City will need to be repaid the full amount of HOME assistance provided. Assisted homeowners wishing to pursue City Council approval may write a letter explaining the need for the subordination and submit it to the Community Development Division. Staff will then prepare a memo and place the subordination on the Community Development Board agenda for recommendation to the City Council.

Use of Recaptured Funds

Recaptured HOME funds will be used to assist other first time homebuyers to purchase property in Billings or other HOME-eligible activities to be determined through the City's budget allocation process in accordance with the Citizen Participation Plan. Homebuyers must be low-income and must use the assisted property with the recaptured funds as their principal residence. Low-income and first time homebuyer status will be determined based on HOME program regulations.

The City of Billings does not propose the use of HOME funds to refinance existing debt secured by multi-family housing that is being rehabilitated with HOME funds.

Tenant-Based Rental Assistance

Tenant-Based Rental Assistance will be used to meet the priority need for rental deposit assistance as determined by the gap analysis in *Welcome Home Billings*, the City's 10-year plan to impact homelessness. This need was also identified in the Housing Needs Assessment. Additional information regarding this need can be found in the City's five-year Consolidated Plan. This investment should assist in narrowing the affordability gap for very low income households.

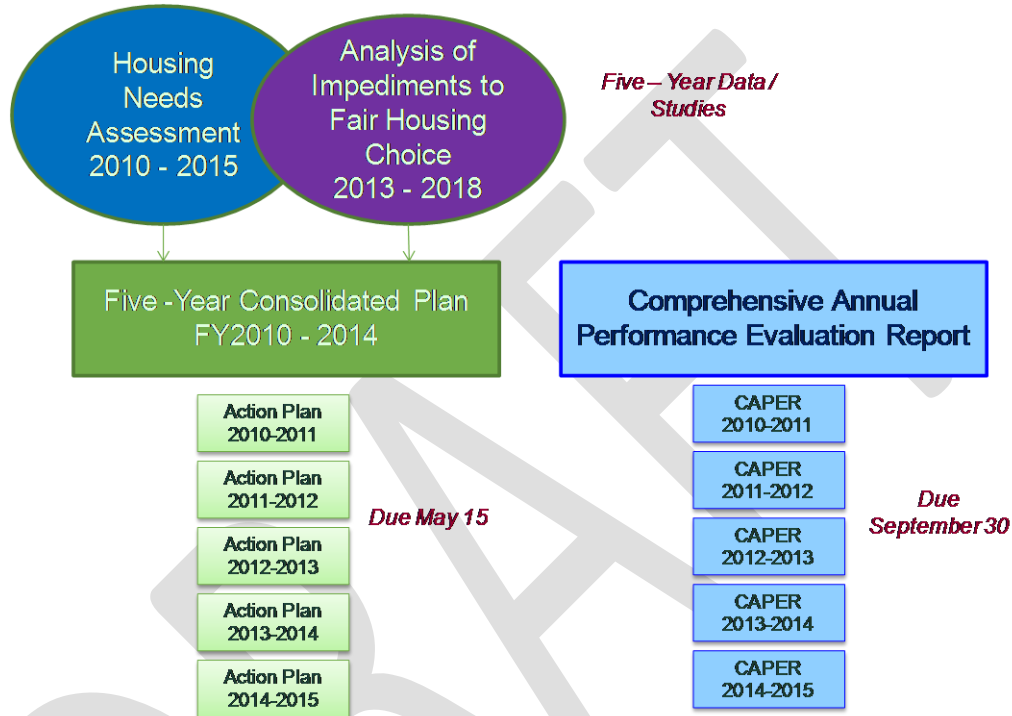
Income Definitions

The City will utilize *adjusted gross income* as defined for reporting purposes under the IRS Form 1040 long form for home repair, rental and first time homebuyer programs. The Housing Authority of Billings utilizes the *Part 5 Annual Income* definition to administer the City's HOME-funded Tenant-Based Rental Assistance deposit assistance program, when funding is available.

SECTION FOUR - Consolidated Plan & Budget Development

Significant Aspects of the Process

The City utilizes significant public comment processes and coordinates input from various organizations and groups in order to maximize collaborative efforts while developing and implementing the Consolidated Plan. Both the Housing Needs Assessment and the Analysis of Impediments to Fair Housing Choice are utilized by City staff as **primary planning tools** for the development and implementation of Consolidated Plan activities.



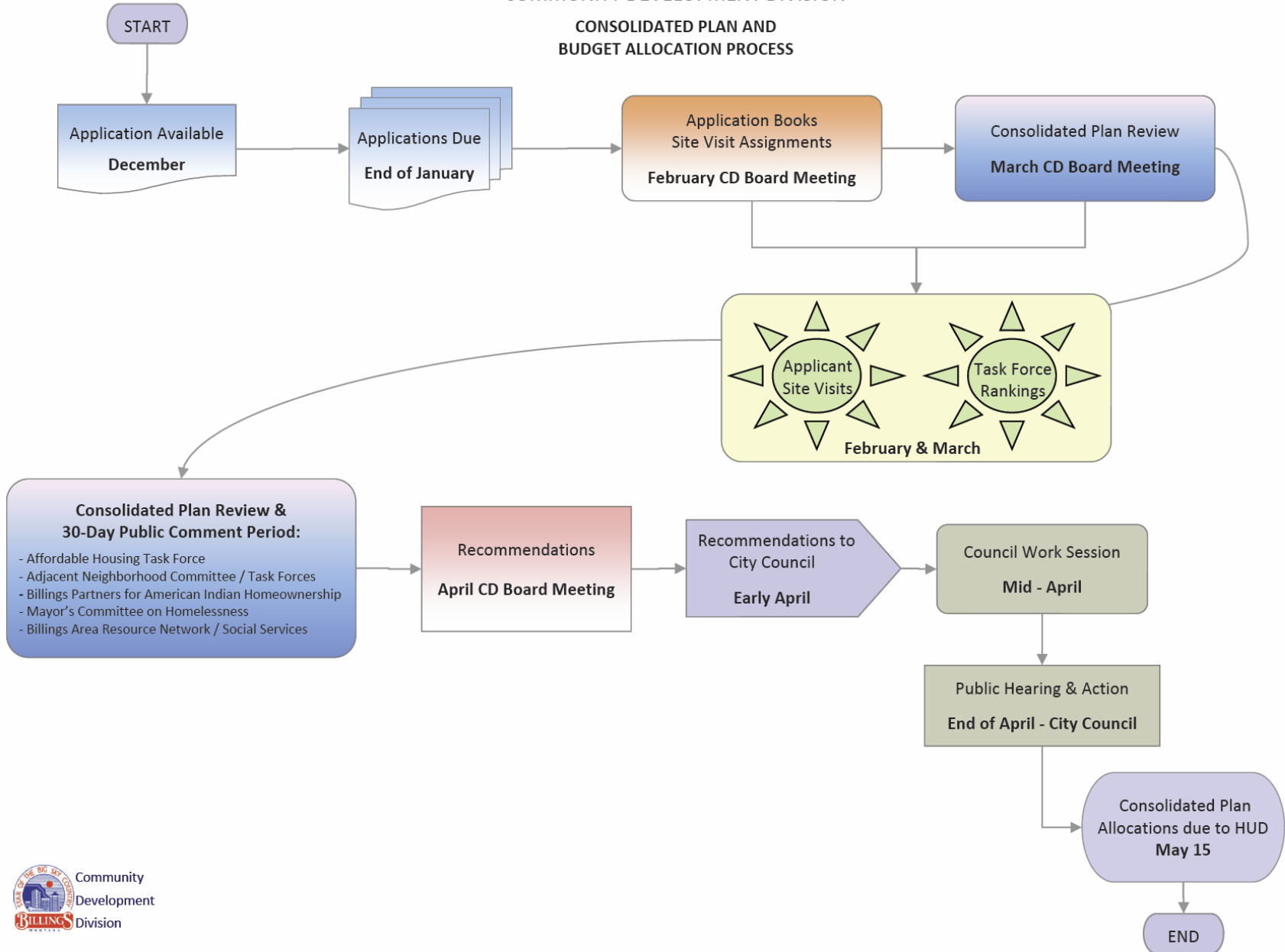
The Budget Allocation Process flowchart (following page) illustrates the significant aspects of public involvement and input processes utilized for Consolidated Plan development and implementation. The process includes a technical assistance meeting to facilitate training of CDBG / HOME applicants regarding application expectations and project requirements. All plans and studies are posted on the City’s website and emails are distributed announcing application and Consolidated Plan postings.

The Community Development Board conducts applicant site visits to review each application with the submitting organization. In addition, City staff visit each of the seven neighborhood task forces to garner housing / neighborhood activity rankings prior to the public comment period. The City also maintains extensive email distribution lists and utilizes these lists to make announcements of study results and drafted plans. Budget hearings are also held to give presentation opportunities to each applicant. Each neighborhood task force is also offered an opportunity to speak during the hearings.

A formalized public comment period is held for no less than 30 days and various community groups are visited during this time to garner feedback on studies, plans and activities. Agenda items are also scheduled for a City Council Work Session and regular City Council meeting; the latter includes an additional, specific public hearing to review the Consolidated Plan and activities. All meetings are open to the public, advertised in the regionally-distributed Billings Times newspaper and agendas offer a specific time for additional public comment.

COMMUNITY DEVELOPMENT DIVISION

CONSOLIDATED PLAN AND BUDGET ALLOCATION PROCESS



November 2012

SECTION FIVE - Geographic Data

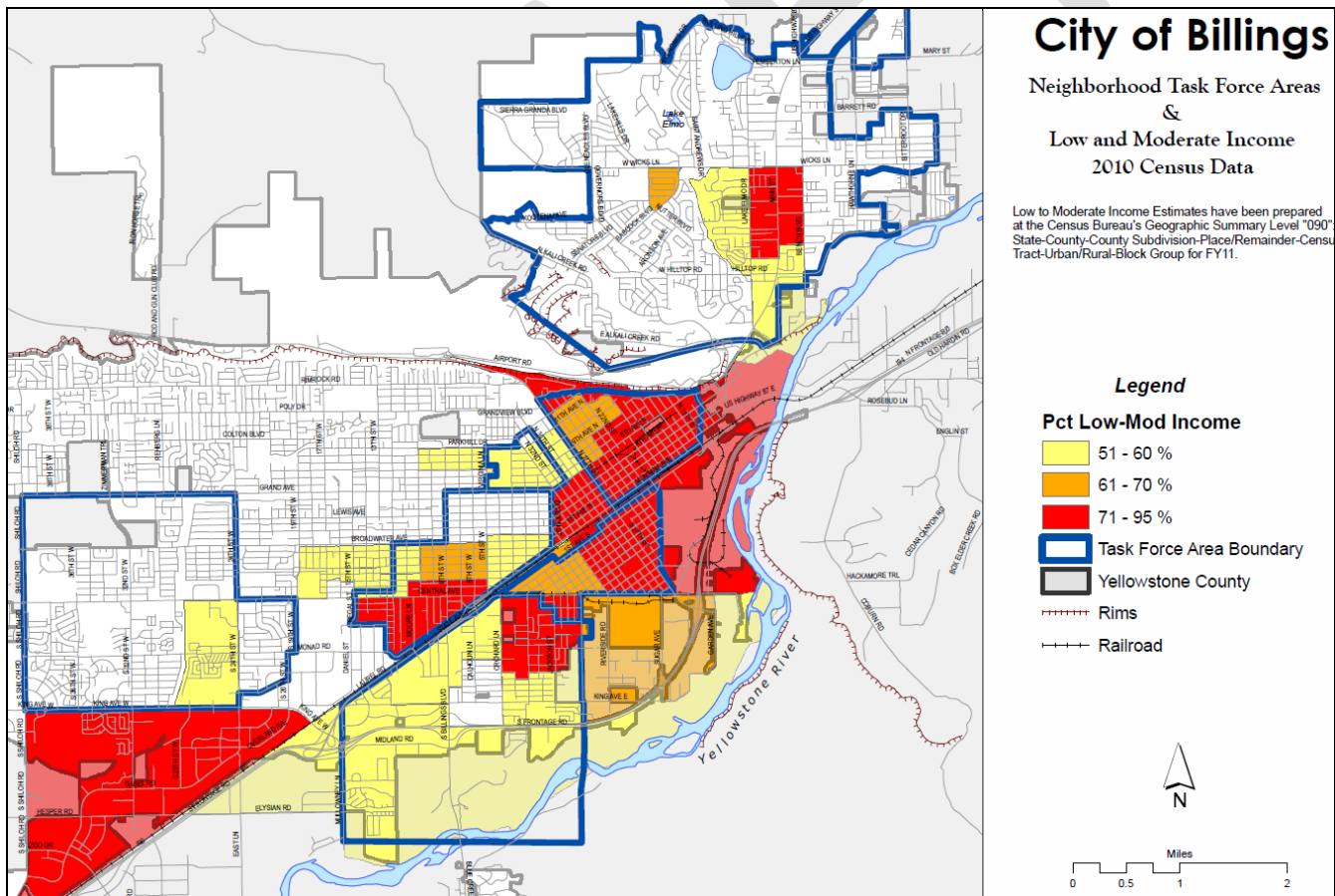
Geographic Area

91.220(d)

The geographic area served by the Consolidated Plan is defined by the current City of Billings limits. Target areas include Census tracts and block groups with high concentrations of low to moderate income households, particularly those with higher concentrations of racial / minority households.

Lower-Income Household Concentration

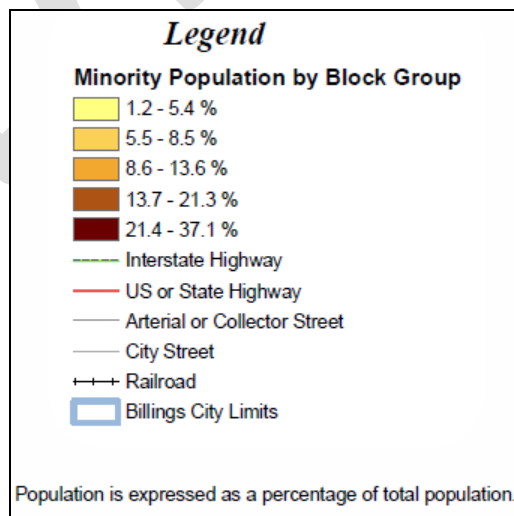
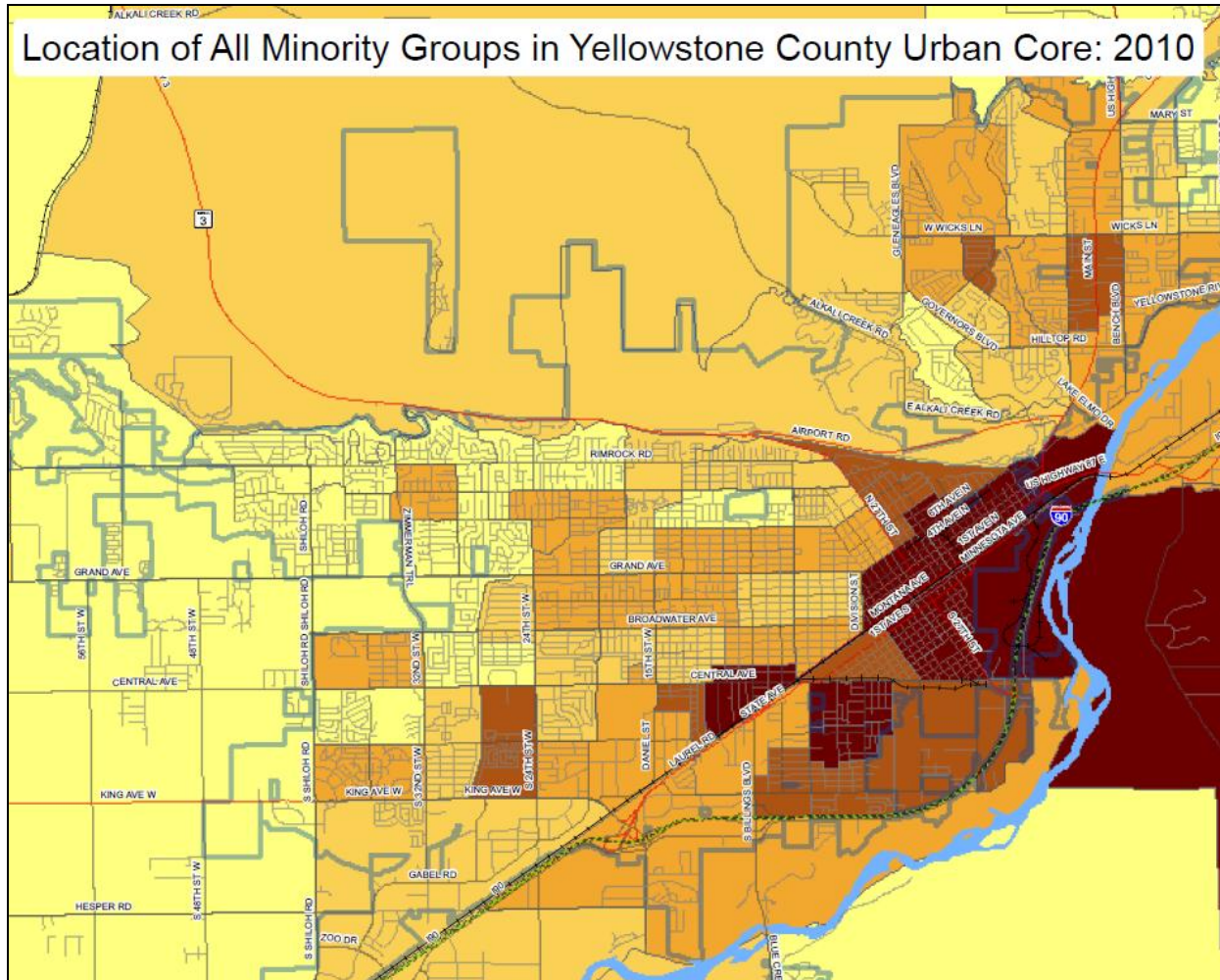
The strategies identified in the Consolidated Plan will be addressed on a citywide basis to encourage the distribution of low-income affordable housing and other assistance to lower income households throughout the community. Strategy D ensures assistance provided through CDBG and related programs to lower income neighborhoods of the communities where the majority of the City's affordable housing stock is located. The map below identifies areas of the community with lower income population above 71%, between 61% and 70%, and between 51% and 60% to allow further prioritization of limited resources.



Lower Income Areas in Billings

Racial / Minority Concentration

In 2012, the City generated a map illustrating the results of the 2010 Census relating to concentrations of racial / ethnic minorities. The resulting map below shows the highest concentration of protected class residents in Billings.



Geographic Basis for Allocation of Investments

91.220(f) & 91.215(a)(2)

The City of Billings is the largest city with the highest population in the state. However, the city only has an estimated population of nearly 104,000 in 2008, according to the 2010 Billings Housing Needs Assessment.

Citation 24 CFR 91.220(f) reads as follows, “When appropriate, jurisdictions should estimate the percentage of funds they plan to dedicate to target areas.” Estimating the percentage of funds planned for dedication to target areas is not appropriate for the Billings community due to the following reasons:

- Geographic area is defined by the current City of Billings limits.
- Target areas include high concentrations of low income households, particularly those with higher concentrations of racial / minority households.
- City-wide strategies encourage the distribution of resources support affirmatively furthering fair housing and equal opportunity to avoid segregation in Billings.
- Geographic distribution of investments description includes the focus of resources on a city-wide basis to support diversity across the community.
- The City of Billings is classified as a smaller city on a national scale.
- The actual dollar amount dedicated to each program is included in this Action Plan.

The City will focus distribution of investments on a citywide basis in order to support diversity and mixed-income development across the community. The City’s performance in serving predominantly low income households is clear via Integrated Distribution Information System reporting; nearly 100%.

Neighborhood Revitalization Strategy areas **have not been established** in Billings and there is no specific amount of funding allocated for a target area in the City’s geographic distribution of resources. **Therefore, the City plans to dedicate 0% of funding to target areas in favor of supporting a citywide approach to further fair housing, equal opportunity and anti-segregation efforts.**

Basis for Assigning Priority - Overall Consolidated Plan

Priorities for funding are based on both the most recent Housing Needs Assessment and the Analysis of Impediments to Fair Housing Choice. Priorities for housing development are identified as “High” “Medium” and “Low” based on data analysis.

Obstacles to Meeting Underserved Needs - Overall Consolidated Plan

91.215(a)(3)

The primary obstacle faced by the City in undertaking the activities described in its Consolidated Plan and meeting under-served needs is the amount of available funding. The Housing Needs Assessment identified the affordable housing needs and conditions of our community. These conditions, particularly the cost burden faced by very low income renters and homeowners, is difficult to address given existing resources, and other needs of the community related to neighborhood improvement, housing preservation, and improving the economic conditions of lower income households.

In addition to funding for projects and programs, there is a need for additional funding for administration and planning costs to help design strategies and undertake projects to help meet these needs. The City attempts to leverage its CDBG and HOME resources as evidenced by past partnerships with the Montana Board of Housing, Wells Fargo, and Fannie Mae.

The City's ability to undertake such activities is limited by staffing levels. This issue has been partially addressed by establishing and supporting community partnerships to address housing and community development needs. The work of the Affordable Housing Task Force, Adjacent Neighborhood Committee, neighborhood groups, various Fair Housing organizations, and the Billings Partners for American Indian Homeownership increase local resources and capacity to address housing and community development needs.

DRAFT

SECTION SIX - Resources

Available Funding, Expenditure Limits & Match Requirements

91.220(c)(1&2)

At the time of this writing, HUD has not provided the City with allocation amounts for this fiscal year and the budget has been estimated at an 8.2% reduction from last year's allocation. CDBG administration and planning activities are estimated and budgeted at \$154,226 which is 20% of the new CDBG estimated allocation (\$523,603) in addition to eligible program income left over from the previous year and including income from the current year (\$247,526). The proposed budget includes \$115,933 in funding from projects which have been cancelled or completed (cannot be included in administration costs). One hundred percent of available funding will be used to benefit the low to moderate income households.

The maximum amount of funding available for Public Service Activities is \$106,903. This amount represents 15% of prior year income (15% of \$189,082 is \$28,362) and the new CDBG estimated allocation (15% of \$523,603 is \$78,541), and no additional reprogrammed funding from Public Services from prior years. The City is choosing to allocate only \$50,000 in Public Service Activity funding to support the expenses of the AmeriCorps VISTA program to facilitate the City's anti-poverty strategy.

HOME administration activities are estimated and budgeted at \$28,924 which includes 10% of estimated new HOME revenue (10% of \$289,243 is \$28,924). As First Time Homebuyer funding returned to the City prior to the affordability period expiring is considered "recaptured" funding, no additional "program income" has been received and considered eligible for additional administration expenses. Total amount of recaptured income received and dedicated to this year's budget is \$260,967.

The HOME program requires 25% match funding for projects be dedicated from non-federal sources. The City of Billings meets HOME matching requirements through low-interest financing available for First Time Homebuyer Loans issued through the Montana Board of Housing (MBOH) and matching funds provided for other affordable housing projects undertaken with HOME funds, such as private contributions and other local bank financing.

Expected Program Income - CDBG & HOME

Program income expected for the CDBG program includes repayments for funding loaned through the Housing Rehabilitation Loan program and other revitalization efforts. The City expects to receive approximately \$100,000 in repayments for this fiscal year which will be reprogrammed for CDBG-eligible activities for next fiscal year. The City will not receive proceeds for Section 108 loan guarantees, surplus funds from urban renewal settlements, or float-funded activities.

Program income expected for the HOME program includes repayments from Homeword for the High Sierra project in an annual amount of \$1,500 according to the HUD-approved work out plan completed in December 2009. Other repayments include recaptured and program income funding generated by the First Time Homebuyer Loan program. The City expects to receive approximately \$100,000 in HOME funding through these venues, and the funding will be re-programmed and utilized for HOME-eligible activities next fiscal year. The City of Billings programs 100% of CDBG and HOME funding to benefit low to moderate income households and / or areas.

Neighborhood Stabilization Program Plan & Expected Program Income

The City of Billings approved a Substantial Amendment to the City of Billings' Annual Action Plan for FY2008-2009 on January 26, 2009 to utilize funds provided under the Housing and Economic Recovery Act of 2008 (HERA) (Pub. L. 110-289, 122 Stat. 2654, enacted July 30, 2008) through the HUD Neighborhood Stabilization Program (NSP). The geographic area covered in the Action Plan and amendment is the City of Billings municipal boundaries, with priority emphasis on areas with a high foreclosure risk in low income task force areas.

The NSP provided \$19.6 million in CDBG funds to the Montana Department of Commerce (MDOC) to acquire and redevelop foreclosed properties that might otherwise become sources of abandonment and blight within their communities. In addition, the funds can be used to purchase foreclosed or abandoned homes and to rehabilitate, resell, or redevelop these homes in order to stabilize neighborhoods and stem the decline of house values of neighboring homes.

The City of Billings intends to utilize granted funding and program income in a manner that complies with regulations established by HUD. This includes obligating funding via contract for service within 18 months of HUD's approval of the MDOC's Action Plan Amendment¹ and full expenditure of obligated funds within 48 months of HUD's approval date.

Approximately \$100,000 in program income is anticipated from the initial sale of vacant and foreclosed homes to low income households as acquisition funds are repaid to the City. Funding will be utilized to further the goals of the NSP program until July 30, 2014. Funding received thereafter is subject to the requirements of the CDBG program. As per HUD, the City will avoid the undue enrichment of entities, including individuals and households benefitting from the program.

All projects will be located in the City of Billings municipal limits which have been determined to be eligible for NSP project funding due to city blocks having HUD foreclosure risk scores between five and eight. Periods of affordability will be assigned in accordance with the subsidy amount committed and expended for each project. The City will not undertake activities which will trigger the Uniform Relocation Act. The City will be leveraging funding from available application sources including CDBG, HOME and partner-provided funding sources to facilitate NSP activities.

In general, the City will undertake the following activities, to be funded in part with NSP funding:

- Acquisition, rehabilitation (including infrastructure as part of redevelopment) and resale of foreclosed or abandoned homes to income-qualified homebuyers as their primary residence.
- Financial assistance to income-qualified homebuyers who are purchasing an abandoned or foreclosed home.
- Acquisition of properties and demolition of existing structures that meet the definition of blight in the community. These properties will be redeveloped in the future for use as permanent affordable housing.

¹ Montana Department of Commerce Website, November 2008, http://housing.mt.gov/Includes/CP/ApplicationDocs/CP_NSP-Amendment.pdf

Resources Complimenting the HOME Program

In addition to HOME funding, the City of Billings will also work with the Montana Board of Housing to secure primary mortgages for first time homebuyer activities. The City of Billings will also support applications for funding as requested for the following programs subject to the priorities established in the Consolidated Plan:

- HUD Section 202 Senior Housing
- HUD Section 811 Housing for the Physically Disabled
- HUD Supportive Housing and Shelter Plus Care Programs
- Special appropriations available through Congress for special projects
- Funding through the Federal Home Loan Bank
- Low-Income Housing Tax Credits

The City of Billings also is considered a partner in many activities that address the community's housing needs, particularly those carried out by human service agencies as public service activities in the CDBG program. The City's contribution to these projects often represents a small part of the overall funding resources to address a particular need. Furthermore, there are other local, state, and federal resources to address those needs such as FEMA funding for emergency shelters, funding received by the Housing Authority of Billings, and rental assistance provided by private non-profit assisted housing providers.

The City does not plan to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, with the exception of approval of a Community Housing Development Organization (CHDO) project. In this instance, the terms of repayment will be established in accordance with 24 CFR 92.206(b).

SECTION SEVEN - Allocations & Project Descriptions

FY2013-2014 Program Allocations

Allocation recommendations conform to pre-determined spending requirements on several categories including: CDBG and HOME Administration caps (maximum of 20% and 10% of new funding prospectively); Public Service Caps (up to 15% of new CDBG funding); and Community Housing Development Organizations (at least 15% of new HOME funding).

At the time of publication, HUD has not released final allocations for the CDBG and HOME programs. Therefore, the City has estimated an 8.2% decrease for both programs. The City has made the following funding recommendations, regardless of the level of HUD funding

CDBG:

- Administration: Fund at the maximum allowed, which is 20% of new funding allocation and program income.
- VISTA Support: \$50,000 as a Public Service activity.
- Housing Rehabilitation Loan Program: funded at \$350,000 as a firm figure.
- Foreclosure Acquisition / Rehabilitation Loan Program: funded at \$250,000 as a firm figure.
- Manufactured Home Repair Loan Program: Remaining funding, estimated at \$82,836.

HOME:

- Administration: Fund at the maximum allowed, which is 10% of new funding allocation.
- Community Housing Development Organization: fund at \$48,000 to Homeward's Pheasant Home affordable rental housing project.
- First Time Homebuyer Loan Program: Remaining funding, estimated at \$473,286.

Funding estimates utilizing these priorities are found on the following page.



PROJECT SUMMARIES

Housing, Neighborhood and Public Service Activities

FY2013-2014 Consolidated Plan

#	Organization Name	Project Name	Award Amount
HN-01	City of Billings	CDBG Administration	\$154,226
<p><i>General CDBG administration expenditures and salary and benefits for Community Development Block Grant (CDBG) Program. CDBG resources also provide the resources for administration of other grants related to community development received by the City.</i></p>			
HN-02	City of Billings	HOME Administration	\$28,924
<p><i>General HOME administration expenditures and salary and benefits for the HOME Program Coordinator.</i></p>			
HN-03	City of Billings	Community Housing Development Orgs	\$48,000
<p><i>A minimum of 15% of the HOME annual allocation is required by HUD to be reserved for Community Housing Development Organizations (CHDOs) for new housing development activities.</i></p>			
HN-04	City of Billings	First Time Homebuyer Program - HOME	\$473,286
<p><i>Assists low-income first time homebuyers with down payment and closing costs. Assistance is based on household size and income. Loans are 0% interest, no-payments due until the home is sold / refinanced.</i></p>			
HN-05	City of Billings	Housing Rehabilitation	\$350,000
<p><i>Housing rehabilitation assistance is available to low-income homeowners and staff costs to implement the program. Loans are 0% interest, no-payments due until the house is sold / refinanced.</i></p>			
HN-06	City of Billings	Manufactured Home Repair	\$82,836
<p><i>The City of Billings offers a loan program for low-income manufactured home owners. This program is intended to revitalize established neighborhoods and preserve the existing affordable housing stock through the completion of repairs to manufactured housing.</i></p>			
HN-07	City of Billings	Foreclosure Acquisition / Rehab	\$250,000
<p><i>The Neighborhood Stabilization Program purchases vacant and foreclosed properties for the purpose of rehabilitation and direct homeownership assistance to income qualified homebuyers as their primary residence. The purpose of the program is to stabilize neighborhoods, stem the decline of house values of neighboring homes due to foreclosure, and to preserve decent affordable housing.</i></p>			
PS-01	City of Billings	VISTA Support - Public Service Activity	\$50,000
<p><i>Project would support administration costs to implement the Billings Metro VISTA Project. These AmeriCorps members work on poverty impact issues in the community including hunger, homelessness, education, and veterans / military family support.</i></p>			
Total Awards:			\$1,437,272

Homeless, Non-Homeless & Special Needs Populations

The City would serve non-homeless individuals exclusively through home repair and first time homebuyer programs for this year, which would also serve special needs populations such as the disabled and elderly. There is no specific funding allocation to exclusively serve special needs populations through these programs; therefore, they are not listed in the City's Table 3B adaptation.

The City has allocated CHDO funding to Homewood for Pheasant Home, an affordable rental housing project, before this fiscal year and the project will undoubtedly serve some special needs populations. However, this funding allocation was not specifically designated to serve a special needs population.

Providers Named in the Plan & Funding Allocations

The City identifies programs and partnerships in Table 3A (beginning on page 51) with identified funding sources the City receives. If ADMIN is noted as a funding source, City staff support the overall initiative with facilitation within the allocation caps for CDBG and HOME to support the overall goals of the Consolidated Plan. The City's recommended funding allocations for programs are included on the previous page. There are no allocations to other organizations this fiscal year due to very low funding levels.

Other Sources of Federal Funding

The City has not estimated the amount of funding allocated to the Supportive Housing Program, Single Room Occupancy residences, the Shelter Plus Care program, Housing Opportunities for People With AIDS, or Emergency Shelter Grants, as the City does not directly receive these funds. These sources of funding are not available for allocation through the City's Consolidated Plan process. The City will not be duplicating reporting provided through other sources of funding.

The City has provided funding to organizations receiving the above-mentioned program funding, but does not have adequate funding to do so for this fiscal year.

SECTION EIGHT - Annual Objectives & Tables

Required Tables

91.220(c)(3)

HUD's **Table 3A, Version One**, *Summary of Specific Annual Objectives*, is a summary of specific annual objectives which organizes objectives by type, including rental housing, owner housing, special needs, community development, public facilities, public services, and economic development. The table identifies sources of funds, performance indicators, expected numbers, actual numbers and the identification of HUD's established outcomes / objectives.

HUD's **Table 3A, Version Two** is a summary of specific annual objectives which organizes objectives by HUD's established outcomes / objectives, including:

- Availability / accessibility of decent housing (DH-1)
- Affordability of decent housing (DH-2)
- Sustainability of decent housing (DH-3)
- Availability / accessibility of suitable living environment (SL-1)
- Affordability of suitable living environment (SL-2)
- Sustainability of suitable living environment (SL-3)

HUD OBJECTIVES / OUTCOMES MATRIX			
	<i>Availability / Accessibility</i>	<i>Affordability</i>	<i>Sustainability</i>
<i>Decent Housing</i>	DH-1	DH-2	DH-3
<i>Suitable Living Environment</i>	SL-1	SL-2	SL-3
<i>Economic Opportunity</i>	EO-1	EO-2	EO-3

Version Two also identifies sources of funds, performance indicators, expected number, actual number and percent completed. These figures will be located in the City's Comprehensive Annual Performance Evaluation Report (CAPER) for each fiscal year.

The Table 3A provided in this Annual Action Plan meets the requirements of both versions (one and two, described above). Goals related to capacity-building for non-profit organizations and administrative support tasks such as newsletter distribution for low-income neighborhood task forces do not relate well to the established HUD Outcomes / Objectives matrix, and are also identified in the table as "Admin."

Table 3B: Annual Affordable Housing Completion Goals information will be provided in the CAPER. Expected annual number of housing units and funding source is currently identified in Goals for the Consolidated Plan and Tables 3C. The City utilizes a modification of Table 3B to illustrate the components of the information recommended for inclusion in the Annual Action Plan, including: estimated number of units; funding source; Table 3B type (special beneficiary, rental, homeowner, combined owner/renter); and Table 3B Activity (rehab, production of new units, homebuyer assistance, and special beneficiaries such as homeless households).

Tables 3C can be found in the Appendices.

Affirmatively Furthering Fair Housing: The following chart illustrates the results of the latest AI, including identified impediments to fair housing choice and recommended strategies to impact barriers. In order to further illustrate the City’s intent to affirmatively further fair housing, impediments and strategies identified in the AI are linked to the City’s overall Annual Action Plan activities in Table 3A.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE	
Selected Impediments	Proposed Strategies
<p>A. Concentrations of minorities that would not exist in a free market not distorted by discrimination suggest that Billings has a dual housing market; one for non-Hispanics, whites and Asians and another for all other minorities.</p>	<p>A1: Produce and disseminate consumer education on Fair Housing issues through ongoing publicity campaigns to make people aware that they can move anywhere in the area they can afford.</p>
	<p>A2: Work to expand housing choices of existing and potential new residents beyond neighborhoods identified by their own race or ethnicity.</p>
<p>B. Discriminatory real estate industry practices such as racial and ethnic steering distort the free market in housing.</p>	<p>B1: Continue to partner with enforcement agencies providing testing of the real estate industry practitioners to identify discriminatory practices in rental and for-sale housing.</p>
<p>C. Discrimination against Latinos in issuing government-backed mortgage and refinancing loans continues unabated in Billings as it does throughout the nation.</p>	<p>C1: Support the efforts of local housing counseling agencies, especially to Latinos, before they apply for a mortgage.</p>
	<p>C2: Continue to provide brochures containing information apprising potential home buyers of the availability of housing counseling and how to spot / report discriminatory lending practices.</p>
<p>D. The relatively high cost of housing continues to pose a barrier to fair housing choice in Billings.</p>	<p>D1: Continue to work toward the provision of affordable housing through Community Development programs.</p>
<p>E. Review Unified Zoning Regulations and review requirements to foster compliance with fair housing law and to promote inclusionary zoning.</p>	<p>E1: Support the efforts of the Planning Division in reviewing:</p> <ul style="list-style-type: none"> - Minimum percentage of affordable housing units per development with five or more units. - Housing Authority of Billings first right of refusal for inclusionary units. - Amendments for neighborhood plans to promote stable, socio-economically diverse neighborhoods throughout Billings. - Affirmative marketing and billboard advertising requirements. - Developer brochure distribution requirements. - Fair Housing logo / language requirements for agreements. - Occupancy requirements and equal treatment for group living for the disabled. - Accessory dwelling units / cottage cluster homes.
	<p>E2: Support the efforts of the Planning Division in reviewing:</p> <ul style="list-style-type: none"> - Minimum percentage of affordable housing units per development with five or more units. - Housing Authority of Billings first right of refusal for inclusionary units. - Amendments for neighborhood plans to promote stable, socio-economically diverse neighborhoods throughout Billings. - Affirmative marketing and billboard advertising requirements. - Developer brochure distribution requirements. - Fair Housing logo / language requirements for agreements. - Occupancy requirements and equal treatment for group living for the disabled. - Accessory dwelling units / cottage cluster homes.
<p>F. There is a serious shortage of housing affordable to holders of Housing Choice Vouchers in the areas of Billings where the proportion of public school students from low-income neighborhoods is relatively low.</p>	<p>F1: Support efforts promote economic diversity in all schools to ensure every school has a majority of pupils coming from middle-class / higher-income households.</p>
	<p>F2: Support the Housing Authority’s efforts to expand the geographic range where holders of Housing Choice Vouchers look for housing.</p>

Integration of Livability Principles: The formation of the interagency Partnership for Sustainable Communities involved HUD, the U.S. Department of Transportation and the US Environmental Protection Agency in June 2009. These three agencies are working together to support efforts to expand housing and transportation efforts while protecting the environment. This partnership promotes reinvestment in existing communities, expanding access to employment and education, and collaborative planning.

LIVABILITY PRINCIPLES		
Principles	Strategies	City Principles
A. Provide more transportation choices.	Develop safe, reliable, and economical transportation choices to decrease household transportation costs, reduce our nation’s dependence on foreign oil, improve air quality, reduce greenhouse gas emissions, and promote public health.	Ensure all newly developed housing units supported with City funds are located adjacent to existing transportation services and undergo Environmental Review to assure impact to the environment is minimized.
B. Promote equitable, affordable housing.	Expand location- and energy-efficient housing choices for people of all ages, incomes, races, and ethnicities to increase mobility and lower the combined cost of housing and transportation.	Ensure equal access to projects supported by home repair, first time homebuyer, and development programs, and ensure projects are offered citywide.
C. Enhance economic competitiveness.	Improve economic competitiveness through reliable and timely access to employment centers, educational opportunities, services and other basic needs by workers, as well as expanded business access to markets.	Support public service activities, the development of social enterprise businesses and Section 3 activities.
D. Support existing communities.	Target federal funding toward existing communities through strategies like transit oriented, mixed-use development, and land recycling to increase community revitalization and the efficiency of public works investments and safeguard rural landscapes.	Ensure community revitalization efforts remain in overall strategies and activities of the Consolidated Plan and continue to work cooperatively with other departments to integrate planning.
E. Coordinate and leverage federal policies and investment.	Align federal policies and funding to remove barriers to collaboration, leverage funding, and increase the accountability and effectiveness of all levels of government to plan for future growth, including making smart energy choices such as locally generated renewable energy.	Ensure partnerships, where possible, are created and maintained to maximize program usage.
F. Value communities and neighborhoods.	Enhance the unique characteristics of all communities by investing in healthy, safe, and walkable neighborhoods; rural, urban, or suburban.	Support housing and transportation development activities designed to reflect existing neighborhoods and walkable / vailable communities.

GOALS FOR FY2013-2014 CONSOLIDATED PLAN

Table 3A - Summary of Specific Annual Objectives & Affirmatively Furthering Fair Housing

July 1, 2013 through June 30, 2014 Goals

Strategy	Objective	Activity	Measurement Type	FY13-14 Goals	Objectives / Outcomes	Funding Source	AI Barriers Impacted	AI Strategies Implemented	Livability Principles	
A: Promote the preservation of the existing supply of safe, affordable housing in the community.	Provide direct, affordable financing and assistance to low-income homeowners for the completion of needed repairs, citywide.	Housing Rehabilitation Loan Program	Housing Units	10	SL-2	CDBG	D	D1	B, C, F	
		Manufactured Home Repair Loan Program	Housing Units	5	SL-2	CDBG	D	D1	B, C, F	
		Foreclosure Acquisition / Rehabilitation Loan Program	Housing Units	1	SL-2	CDBG	A, C, D	A1, A2, C1, C2, D1	B, C, F	
	Provide financing and assistance through partnerships to facilitate needed repairs for special needs populations located citywide.	Rehabilitation for special needs populations	Housing Units	2	DH-1	CDBG	D	D1	B, C, F	
	Benchmark Performance Measures	% of total funding allocated to enhance existing housing:		37%	-	-	-	-	-	
B: Promote new affordable housing opportunities.	Encourage the development of new affordable single-family, multi-family and special needs housing in the community through private developers and non-profit organizations.	Affordable Housing Development Program	Housing Units	16 Total / 4 CHDO Units	SL-2	CDBG/HOME	A, C, D	A1, A2, C1, C2, D1	A, B, C, D, F	
		Complete Kings Green single-family development	Housing Units		4	SL-2	HOME	C, D	C1, C2, D1	A, B, C, D, F
		Support the efforts of the Housing Authority of Billings	Five-Year Plan Implemented		1	DH-2	ADMIN	A, D, E, F	A1, A2, D1, E1, F2	E
		Meet CHDO commitment / expenditure deadlines	Years in Compliance		1	SL-2	HOME	A, D	A1, A2, D1	A, B, C, D, F
	Provide affordable financing and support to promote homeownership opportunities citywide.	First Time Homebuyer Program	Households	30	SL-2	CDBG/HOME	A, C, D	A1, A2, C1, C2, D1	A, B, E, F	
		First Time Homebuyers - MBOH Set-Aside Use	Households	3	DH-2	-	A, C, D	A1, A2, C1, C2, D1	A, B, E, F	
			Leveraged Funding	\$0.3M	DH-2	-	A, C, D	A1, A2, C1, C2, D1	A, B, E, F	
		Homebuyer Education	Households	100	EO-3	CDBG/HOME	A, C, D	A1, A2, C1, C2, D1	B, C, E, F	
		Billings Partners American Indian Homeownership	Homeownership Rate (1992 benchmark: 22%)	0.08	EO-1	ADMIN	A, C, D	A1, A2, C1, C2, D1	B, C, E, F	
	Benchmark Performance Measures	% of total funding allocated to promote new housing opportunity citywide:		47%	-	-	-	-	-	

Strategy	Objective	Activity	Measurement Type	FY13-14 Goals	Objectives / Outcomes	Funding Source	AI Barriers Impacted	AI Strategies Implemented	Livability Principles
C: Active partnerships with non-profits, neighborhood groups and others to address housing and community development specific to lower income and special needs households.	Support partnerships and regular meetings to facilitate community participation and collaboration.	Affordable Housing Task Force	Quarterly Meetings	4	DH-2	ADMIN	A, B, C, D, E, F	A1, A2, B1, C1, C2, D1, E1, F1, F2	B, E, F
		Billings Partners American Indian Homeownership	Quarterly Meetings	4	EO-1	ADMIN	A, B, C, D, E, F	A1, A2, B1, C1, C2, D1, E1, F1, F2	B, E, F
		Analysis of Impediments to Fair Housing Choice completed to implement activities by 2013	Analysis / Plan completed	1	SL-1	ADMIN	A, B, C, D, E, F	A1, A2, B1, C1, C2, D1, E1, F1, F2	B, E, F
	Encourage activities that promote fair housing and increase awareness of the rights of protected classes.	Continue to support organizations with an interest in fair housing to apply for FHIP, facilitate application if necessary	Consider annual submission of FHIP grant representing residents of Billings, depending on staff time availability	0 or 1	SL-1	ADMIN	A, B, C, D, E, F	A1, A2, B1, C1, C2, D1, E1, F1, F2	B, E
	Encourage collaboration to better address needs and to respond to opportunities for special needs populations.	Mayor's Committee on Homelessness	Bi-Monthly Meetings	6	EO-3	ADMIN	D, F	D1, F2	B, E
		Assist in the implementation of Welcome Home Billings, the City's ten-year plan to impact homelessness.	Completed FY13-14 Staff Action Plan	1	SL-1	ADMIN	D, F	D1, F2	E
			Completed FY2012-2013 Performance Report	1	SL-3	ADMIN	D, F	D1, F2	E
		Facilitate AmeriCorps VISTA application and pursue project status	Annual submission of VISTA grant application / VISTA member placements	1	EO-1	CNCS	D, F	D1, F2	E
	Benchmark Performance Measures	% of total funding allocated to support partnerships:		13%	-	-	-	-	-
	D: Promote the preservation and revitalization of the community's older neighborhoods.	Preserve housing stock in older, lower-income neighborhoods.	See objectives / activities / goals outlined in Strategy A		-	SL-1	CDBG/HOME	D	D1
Infill development of vacant lots and redevelopment of substandard properties.		Affordable Housing Development & Home Repair Programs	See goals for Strategy B	-	SL-3	CDBG/HOME	D	D1	B, F

Strategy	Objective	Activity	Measurement Type	FY13-14 Goals	Objectives / Outcomes	Funding Source	AI Barriers Impacted	AI Strategies Implemented	Livability Principles
D: Promote the preservation and revitalization of the community's older neighborhoods, continued.	Support activities that provide amenities, neighborhood stabilization and maintain infrastructure needs.	Neighborhood improvements through the Capital Improvement Plan (CIP)	CIP Years Implemented	1	SL-3	-	D, E	D1, E1	A, B, C, D, E, F
E: Provide assistance to agencies serving lower income and special needs populations, particularly the homeless, the elderly, minorities and those with disabilities.	Support non-profit organizations in efforts to build capacity in order to better serve special needs populations.	Facilitate AmeriCorps VISTA application and pursue project status	See goals for Strategy C	-	EO-1	CNCS	D, F	D1, F1	E
	Provide CDBG Public Service funding and HOME Tenant-Based Rental Assistance (TBRA) for deposits to non-profit organizations and provide assistance for supportive services, including job creation.	CDBG Public Service and HOME TBRA funding allocations for basic needs assistance and supportive services	Years Funding Committed	Funding inadequate	EO-1	CDBG/HOME	A, F	A1, F2	B, C, E
			Organizations	Funding inadequate	EO-3	CDBG/HOME	A, F	A1, F2	B, C, E
	Benchmark Performance Measures	% of total funding to support basic needs of special and lower-income populations:		3%	-	-	-	-	-
Overall Benchmark Performance Measures	CDBG Timeliness Compliance			< 1.5	-	-	-	-	-
	% of completed HOME rental disbursements to all rental commitments, benchmark subject to HUD adjustment			> 72.37%	-	-	-	-	-
	% of completed CHDO disbursements to all CHDO reservations, benchmark subject to HUD adjustment			> 49.28%	-	-	-	-	-
	% of renters below 50% of the area median income			> 70%	-	-	-	-	-
	<i>Note: 90% of rental and TBRA units must assist households less than 60% of the area median income</i>				-	-	-	-	-
	% of occupied HOME rental units to all rental units, benchmark subject to HUD adjustment			> 90.81%	-	-	-	-	-
	Allocation years not distributed for HOME, benchmark subject to HUD adjustment			< 3.07%	-	-	-	-	-

Table 3B - Annual Affordable Housing Completion Goals

July 1, 2013 through June 30, 2014 Goals

<i>Activity</i>	<i>Measurement Type</i>	<i>3B Type</i>	<i>3B Activity</i>	<i>FY13-14 Goals</i>	<i># Completed</i>	<i>Funding Source</i>
Housing Rehabilitation Loan Program	Housing Units	Homeowner	Rehab Existing Unit	10		CDBG
Manufactured Home Repair Loans	Housing Units	Homeowner	Rehab Existing Unit	5		CDBG
Foreclosure Acquisition / Rehabilitation Loan Program	Housing Units	Homeowner	Rehab Existing Unit	1		CDBG
Affordable Housing Development Program	Housing Units	Combined Owner / Renter	Production of New Units	16 Total Units 4 CHDO Units		CDBG/HOME
Complete Kings Green single-family development	Housing Units	Homeowner	Production of New Units	4		HOME
First Time Homebuyer Program	Households	Homeowner	Homebuyer Assistance	30		CDBG/HOME
Assist in the implementation of Welcome Home Billings, the City's ten-year plan to impact homelessness.	Completed FY13-14 Action Plan	Beneficiary	Homeless Households	See Welcome Home Billings Reports		ADMIN
	Completed Performance Report	Beneficiary	Homeless Households			ADMIN

CONSOLIDATED PLAN ACTIVITIES BY HUD OBJECTIVE / OUTCOME: Table 1C

Objective	Activity	Measurement Type	FY13-14 Goals	HUD Objectives / Outcomes	Admin
DECENT HOUSING & AFFORDABILITY					
Encourage the development of new affordable single-family, multi-family and special needs housing in the community through private developers and non-profit organizations.	Support the efforts of the Housing Authority of Billings	Five-Year Plan Implemented	1	DH-2	Admin
Provide affordable financing and support to promote homeownership opportunities.	First Time Homebuyers - MBOH Set-Aside Use	Households	3	DH-2	-
Support partnerships and regular meetings to facilitate community participation and collaboration.	Affordable Housing Task Force	Quarterly Meetings	4	DH-2	Admin
SUITABLE LIVING ENVIRONMENT & AVAILABILITY / ACCESSIBILITY					
Support partnerships and regular meetings to facilitate community participation and collaboration.	Analysis of Impediments to Fair Housing Choice completed 2013 to implement activities for 2013-2018	Analysis / Plan completed	1	SL-1	Admin
Encourage activities that promote fair housing and increase awareness of the rights of protected classes.	Continue to support organizations with an interest in fair housing to apply for FHIP, facilitate application if necessary	Consider annual submission of FHIP grant representing residents of Billings, depending on staff time availability	0 or 1	SL-1	Admin
Encourage collaboration to better address needs and to respond to opportunities for special needs populations.	Assist in the implementation of Welcome Home Billings, the City's ten-year plan to impact homelessness.	Completed FY2012-2014 Staff Action Plan	1	SL-1	Admin
Preserve housing stock in older, lower-income neighborhoods.	See objectives / activities / Goals outlined in Strategy A	See objectives / activities / Goals outlined in Strategy A	-	SL-1	-
SUITABLE LIVING ENVIRONMENT & AFFORDABILITY					
Provide direct, affordable financing and assistance to low-income homeowners for the completion of needed repairs.	Housing Rehabilitation Loan Program	Housing Units	10	SL-2	-
	Manufactured Home Loan Repair Program	Housing Units	5	SL-2	-
	Foreclosure Acquisition / Rehabilitation Loan Program	Housing Units	1	SL-2	-
Encourage the development of new affordable single-family, multi-family and special needs housing in the community through private developers and non-profit organizations.	Affordable Housing Development Program	Housing Units	16 Units Total 4 CHDO Units	SL-2	-
Encourage the development of new affordable single-family, multi-family and special needs housing in the community through private developers and non-profit organizations.	Complete Kings Green single-family development	Housing Units	4	SL-2	-
Encourage the development of new affordable single-family, multi-family and special needs housing through private developers and non-profit organizations.	Meet CHDO commitment / expenditure deadlines	Years in compliance	1	SL-2	-

Objective	Activity	Measurement Type	FY13-14 Goals	HUD Objectives / Outcomes	Admin
SUITABLE LIVING ENVIRONMENT & AFFORDABILITY, Continued.					
Provide affordable financing and support to promote homeownership opportunities.	First Time Homebuyer Program	Households	30	SL-2	-
Support activities that provide amenities, neighborhood stabilization and maintain infrastructure needs.	Special Assessment Grants	Housing Units	4	SL-2	-
SUITABLE LIVING ENVIRONMENT & SUSTAINABILITY					
Encourage collaboration to better address needs and to respond to opportunities for special needs populations.	Assist in the implementation of Welcome Home Billings, the City's ten-year plan to impact homelessness.	Completed FY2012-2013 Performance Report	1	SL-3	Admin
Infill development of vacant lots and redevelopment of substandard properties.	Affordable Housing Development Program	See goals for Strategy B	-	SL-3	-
	Redevelopment 27th Street Corridor	Redevelopment Projects	1	SL-3	-
Support activities that provide amenities, neighborhood stabilization and maintain infrastructure needs.	Neighborhood improvements through the Capital Improvement Plan	CIP Years Implemented	1	SL-3	-
ECONOMIC OPPORTUNITY & AVAILABILITY / ACCESSIBILITY					
Provide affordable financing and support to promote homeownership opportunities.	Billings Partners American Indian Homeownership	Homeownership Rate (1992 benchmark: 22%)	40%	EO-1	Admin
Support partnerships and regular meetings to facilitate community participation and collaboration.	Billings Partners American Indian Homeownership	Quarterly Meetings	4	EO-1	Admin
Encourage collaboration to better address needs and to respond to opportunities for special needs populations.	Facilitate AmeriCorps VISTA application and pursue project status	Annual submission of VISTA grant application / VISTA member placements	1	EO-1	Admin
Provide CDBG Public Service funding and HOME Tenant-Based Rental Assistance (TBRA) for deposits to non-profit organizations.	CDBG Public Service and HOME TBRA funding allocations for basic needs assistance	Years Funding Committed	<i>Inadequate funding</i>	EO-1	-
ECONOMIC OPPORTUNITY & SUSTAINABILITY					
Provide affordable financing and support to promote homeownership opportunities.	Homebuyer Education	Households	100	EO-3	-
Encourage collaboration to better address needs and to respond to opportunities for special needs populations.	Mayor's Committee on Homelessness	Bi-Monthly Meetings	6	EO-3	Admin
Provide CDBG Public Service funding and HOME Tenant-Based Rental Assistance (TBRA) for deposits to non-profit organizations.	CDBG Public Service and HOME TBRA funding allocations for basic needs assistance and supportive services	Organizations	<i>Inadequate funding</i>	EO-3	-

OBJECTIVE CATEGORIES

Staff review includes Consolidated Plan, Welcome Home Billings, and the Neighborhood Stabilization Program.

<input checked="" type="checkbox"/>	Decent Housing	<input checked="" type="checkbox"/>	Expanded Economic Opportunities	<input checked="" type="checkbox"/>	Expanded Economic Opportunities
<input checked="" type="checkbox"/>	Assisting homeless persons obtain affordable housing.	<input checked="" type="checkbox"/>	Improving the safety and livability of neighborhoods.	<input checked="" type="checkbox"/>	Job creation and retention.
<input checked="" type="checkbox"/>	Assisting persons at risk of becoming homeless.	<input checked="" type="checkbox"/>	Eliminating blighting influences and the deterioration of property and facilities.	<input checked="" type="checkbox"/>	Establishment, stabilization and expansion of small business (including micro-businesses).
<input checked="" type="checkbox"/>	Retaining the affordable housing stock.	<input checked="" type="checkbox"/>	Increasing the access to quality public and private facilities.	<input checked="" type="checkbox"/>	The provision of public services concerned with employment.
<input checked="" type="checkbox"/>	Increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability.	<input checked="" type="checkbox"/>	Reducing the isolation of income groups within areas through spatial de-concentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods.	<input checked="" type="checkbox"/>	The provision of jobs to low-income persons living in areas affected by those programs and activities under programs covered by the plan.
<input checked="" type="checkbox"/>	Increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence.	<input checked="" type="checkbox"/>	Restoring and preserving properties of special historic, architectural, or aesthetic value.	<input checked="" type="checkbox"/>	Availability of mortgage financing for low income persons at reasonable rates using non-discriminatory lending practices.
<input checked="" type="checkbox"/>	Providing affordable housing that is accessible to job opportunities.	<input checked="" type="checkbox"/>	Conserving energy resources and use of renewable energy sources.	<input checked="" type="checkbox"/>	Access to capital and credit for development activities that promote the long-term economic social viability of the community.

SECTION NINE - Other Required Narratives

Public Housing Strategy

The HAB serves local residents who are extremely low income, very low income, and low income. The HAB plans to apply for all grants that will assist the organization in adding units to its existing programs, and any programs that complement existing services and are able to be implemented by the HAB. The HAB will continue to assess and implement modernization funds to upgrade and restore units and complete energy efficient repairs as needed.

Family Self-Sufficiency: The HAB implements the Family Self-Sufficiency program whose graduates have a 55% homeownership rate. This program links participants to community agencies to help them become self-sufficient through individual goal setting. HAB has been operating the Section 8 Homeownership program since 2006. Thirty-five households have achieved homeownership through this program to date. Resident councils and the Advisory Board are involved in providing input on program needs and assisting others to become actively involved in the process. Additional information is included in the HAB's Five-Year Plan on file at the HAB office.

Housing Authority of Billings Assistance Program Usage / Demand – April 2013

<i>Assistance Programs</i>	<i>Vouchers / Units in Use</i>	<i>Waiting List</i>
Housing Authority Section 8 / 60 VASH HCV Vouchers	579	1,685
State Section 8 - Managed through HAB	450	2,075
Public HAB (Income Eligibility)	274	1,700
HOME Units	27	274
Section 8 Project-Based	102	114
MOD Rehab	39	325
Tax Credit Units	32	114
Total:	1,503	6,287

Source: Housing Authority of Billings

Public Housing Partnerships

The City has granted the HAB funds to build new units through the HOME and CDBG programs in neighborhoods where HAB property exists. The City has also provided funding for a variety of rehabilitation and new construction projects to neighborhoods that have Public Housing units in need of upgrading.

The City has helped rehabilitate properties, sold land for new businesses, and granted land to nonprofits to assist with neighborhood revitalization efforts in neighborhoods where HAB complexes have been built. The City has provided funding for parks and play areas for the neighborhoods where HAB families reside. In addition, the businesses that have moved into areas where HAB properties are located have contributed to the economic stability of the HAB clients. The City's HOME program assists with home ownership down payment assistance and home ownership counseling for clients considering homeownership.

The City coordinates with the HAB for environmental reviews, housing needs assessments, assists in funding new projects when appropriate, and assists with applications for supportive services when called upon for needed assistance. The HAB is a High Performer for PHAS and, therefore, a review of troubled status needs is not required as part of this Consolidated Plan.

Loss of Public / Assisted Housing Units

The HAB does not anticipate any loss in public housing units during the period of this plan. Additionally, the City does not anticipate the loss of other assisted housing units in our community that are owned by other nonprofit housing providers during the period of this plan.

Barriers to Affordable Housing

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Several barriers to the construction of affordable housing and maintaining residency in housing have been identified. They include:

- **Economic Conditions** – The Housing Needs Analysis reports median housing cost has exceeded median household income for certain household income levels. Lower income households have a difficult time affording and maintaining a suitable home in the current market and effects of the economic recession.
- **Cost of Development** - This includes infrastructure costs and leapfrog development.
- **Difficulty in Paying for Needed Repairs** - Many low-income households often pay the maximum percentage of their income for housing costs. Many of these households do not have the resources to pay for needed repairs to the property.
- **Few New Manufactured Housing Developments** - It is difficult for new manufactured housing developments to be approved, which raises the price of existing lots. Owners of manufactured homes have a difficult time finding an affordable place for their housing unit. While manufactured housing does have drawbacks, it also provides an affordable option for many families. The construction quality with manufactured housing continues to improve.
- **Tax Structure** - Dependence on property taxes to support local government costs, including infrastructure.

Specific Housing Objectives for the City

Consolidated Plan strategies are identified following each objective and can be found in Section Eleven.

1. Homebuyer assistance is still needed to close the affordability gap, and has been provided through the First Time Homebuyer program. The Affordable Housing Development program can also be utilized to develop affordable housing. *(Strategy B)*
2. Support affordable housing development at the same levels. This goal is dependent on consistent levels of funding through CDBG and HOME programs. *(Strategy B)*
3. Provide affordable financing opportunities for housing repair to maintain the affordable housing stock. *(Strategy A)*
4. Provide CDBG / HOME financing opportunities through routine allocation processes and the Affordable Housing Development program. *(Strategy B)*

5. Offer affordable financing through the Affordable Housing Development program. *(Strategy B)*
6. Provide affordable financing for rental housing development / repair through the Affordable Housing Development program and deposit / rent assistance through Tenant Based Rental Assistance and Public Service grants. *(Strategies B and E)*
7. Prioritize Universal Design in Request for Proposal processes and also through the Affordable Housing Development program. *(Strategy B)*

Homeless Strategic Plan

The Montana Continuum of Care (CoC) plans to facilitate increased partnership of local governments in addressing homelessness. The City supports this strategy and has become more involved with the CoC Coalition through the Mayor's Committee on Homelessness. A local Continuum of Care group has been convened through the Billings Area Resource Network. The Community Development Division works with service providers to shape outreach, referral and permanent supportive housing programs into a local continuum. Throughout this process, the City supports the Montana Continuum of Care's goals and strategies regarding homelessness, chronic homelessness, and homelessness prevention; the City also assists in the development of plans using services already in place.

Welcome Home Billings is the City's completed ten-year plan to impact homelessness. It is a comprehensive document that includes data, resources, cross-cutting strategic goals and programmatic goals. The "Strategic Framework" can be utilized as a tool and duplicated by other communities wishing to implement plans to impact homelessness. Further, the Mayor's Committee on Homelessness and the Billings Area Resource Network has committed to two-year action plans (located in the City's FY2010-2014 Consolidated Plan appendices). These documents represent full commitments of the leadership involved in both groups, and primarily consist of fully-committed financial resources to implement the plans. Consolidated Plan Strategies are noted on the Programmatic Strategic Goals and Priorities for Housing, Prevention, Services and Assets.

The City's full plan is available online at: www.ci.billings.mt.us/homeless and a copy of the plan is located in the Appendices.

WELCOME HOME BILLINGS

Strategic Framework

Ten-year Plan to Impact Homelessness

Vision: No one in Billings has to be homeless. Everyone in Billings has access to tools and opportunities for safe, appropriate and affordable housing.

Mission: The Mayor's Committee on Homelessness has partnered with local organizations and community members to develop and implement a comprehensive ten-year plan in the pursuit of ending chronic homelessness in the Billings community.

CROSS-CUTTING STRATEGIC GOALS

COLLABORATION	A: Join community partners with resources to address homelessness intervention and prevention efforts and facilitate partnerships to improve collaboration, service array, leveraging and capacity.	
	A1:	Develop resources for funding homeless initiatives and coordinate grant efforts.
	A2:	Support Project Homeless Connect as an annual event.
	A3:	Support the Billings Area Resource Network as a working homeless services / advisory body for the Mayor's Committee on Homelessness.
	A4:	Support the Business Consortium for Social Change to involve businesses in impacting the homeless / near-homeless.
	A5:	Create modes of communication between partnering organizations to facilitate coordination, avoid duplication, and increase collaboration to maximize resources.
AWARENESS	B: Increase advocacy and public knowledge on behalf of the homeless.	
	B1:	Utilize the ten-year plan to provide guidance regarding homeless policy for local, state, and federal entities.
	B2:	Increase understanding of the causes and economic realities of homelessness through targeted public awareness campaigns for homeless projects and service events.
	B3:	Promote understanding and respect for all people experiencing homelessness.
	B4:	Provide venues for those experiencing homelessness to have their ideas and concerns heard.
ACCOUNTABILITY	C: Ensure innovation, fiscal responsibility and long-term effectiveness for projects and programs.	
	C1:	Support both prevention and intervention modalities for projects and programs.
	C2:	Closely monitor trends in the needs of the homeless and near-homeless in Billings in order to respond to community need.
	C3:	Research innovation in homeless services and facilitate capacity-building with local service providers and community organizations to implement improved services.
	C4:	Support education efforts for case management, mentoring and services.
SUSTAINABILITY	D: Ensure high standards for management, accountability and performance measurement.	
	D1:	Embrace public involvement, comment and input for ten-year planning and project development efforts.
	D2:	Ensure performance measurements are implemented with each project and data is gathered and analyzed on a routine basis.
	D3:	Evaluate projects for long-term sustainability as part of the routine processes prior to endorsement or facilitation.
	D4:	Evaluate cost-effectiveness, essential services, and long-term business resource planning for all projects.
	D5:	Embrace public involvement, comment and input for ten-year planning and project development efforts.

WELCOME HOME BILLINGS

Strategic Framework

Ten-year Plan to Impact Homelessness

PROGRAMMATIC STRATEGIC GOALS & PRIORITIES

HOUSING		PREVENTION		SERVICES		ASSETS	
E: Increase the city's supply of decent, affordable housing. Con Plan Strategy B		F: Provide adequate emergency homeless prevention programs. Con Plan Strategies B, C, E		G: Expand treatment /service capacity and linkage to essential services. Con Plan Strategy C, E		H: Increase personal income levels and economic opportunities. Con Plan Strategy C, E	
E1:	Increase supportive housing units, permanent rentals, transitional housing units, veterans housing, emergency shelter beds, housing for those returning from prison and those in recovery.	F1:	Increase funding dedicated to rent, utilities and mortgage assistance.	G1:	Expand coordinated intensive case management and street outreach services for the homeless.	H1:	Increase access to social service and income benefits by ensuring assistance is provided to complete applications.
E2:	Seek federal, state and local funding sources to support affordable housing development for households with very low income (0 - 30% Area Median Income).	F2:	Support incentive programs for landlords to rent to the homeless or those at risk for homelessness, and increase service provider capacity to engage in long-term leasing and / or rental ownership.	G2:	Increase assistance to complete applications and facilitate application streamlining to access services, transportation, employment and housing.	H2:	Support asset development, education, job training, and employment opportunities serving the homeless (and those at risk of homelessness) throughout the community.
E3:	Build local service provider capacity for affordable housing development, management and housing rehabilitation.	F3:	Support pre-release / discharge planning education and intervention for all institutional services including foster care, prison, jail, and behavioral health facilities.	G3:	Increase availability and capacity of health care, mental health, substance abuse services, medication assistance and access to legal assistance to the very low income / uninsured.	H3:	Establish mentoring support systems, life skills training, and childcare assistance to the homeless (and those at risk of homelessness) currently in the workforce.
E4:	Provide Community Housing Development Organization (CHDO) capacity-building opportunities through the City's Community Development Division.	F4:	Utilize <i>housing first</i> and <i>rapid re-housing</i> philosophies in developing housing options to shorten homelessness.	G4:	Support increases in capacity for day center operations across the city.	H4:	Support the expansion of financial fitness and credit assistance programs.
E5:	Decrease barriers to obtaining existing housing units and refine housing placement services and coordination.	F5:	Support case management efforts to transition occupants from shelter care to permanent supportive housing.	G5:	Support expansion of community-based, criminal justice diversion and re-entry programs.	H5:	Promote fair wage rates and competitive bidding through the expansion of social enterprise efforts.
E6:	Facilitate collaborative grant and loan applications for affordable housing development to serve the homeless.	F6:	Support landlord-tenant intervention to prevent eviction.	G6:	Establish one-stop shop to access all services for the homeless.	H6:	Increase financial management services for those in need.

Services in Place

A complete list of service providers for the homeless can be found in the appendices. The City provides 15% of our annual CDBG allocation to Public Service activities in the community. In the past, the City has funded the YWCA Gateway Shelter, Tumbleweed Runaway and Homeless Youth Program, the District 7 Human Resources Development Council (HRDC), Family Service, Inc. and the Yellowstone Health Partnership. These programs provide services to the homeless and near-homeless and are described below.

The YWCA Gateway Shelter serves victims of domestic abuse and violence and sexual assault. CDBG funding is used to support general operating expenses of the program, which include housing, support, education, and advocacy for victims of domestic violence and sexual assault.

Tumbleweed Runaway and Homeless Youth Program is the only agency in Yellowstone County that directly addresses the needs of youth who are homeless, or at-risk of being homeless. The Tumbleweed program's goal is to divert youth from the juvenile justice system through the prevention of delinquency and other social problems. Youth are provided a positive alternative to running away / living on the streets. When youth are unable to return home, Tumbleweed provides shelter as appropriate, and also provides an alternative to jailing runaway and other status offender youth. Tumbleweed's mission and goals are all directed toward the prevention of homelessness, running away, severe family conflict, delinquency, and other social problems among youth.

HRDC District 7 receives Emergency Shelter Grants funds and provides emergency rent or mortgage assistance through those funds. They also administer the Low Income Energy Assistance Program for assistance in meeting the energy use needs of low-income families and individuals. Another program the HRDC administers is the Energy Share program, which helps low-income families remain in their homes. This program provides emergency utility assistance to low income families and individuals. The City provides funds to the HRDC for Housing Counseling, which prevents homelessness through default / foreclosure and rental counseling. Family Service, Inc. helps low-income individuals and families with emergency rent or mortgage expenses.

In the past, the City has provided funding to Yellowstone Health Partnership - Medication Assistance Program, which provides medications to low income households unable to pay for them, and also provides medications in the interim between the application and approval for SSI and Medicaid.

In addition to these activities, CDBG funding has been made available as a rehabilitation activity to build ramps for the disabled and to make accessibility improvements through the Housing Rehabilitation and Manufactured Home Repair programs.

HOME funding may also be available for housing for homeless and the special needs population, including Tenant-Based Rental Assistance, if funding levels should increase. The City lists several goals and strategies in the Consolidated Plan which can be utilized to guide activities to assist the homeless, including promoting new affordable housing opportunities, emphasizing new / converted special needs housing, and working as an active partner with nonprofits, neighborhood groups, and others to address housing and community development needs.

Essential Services

The Office of Public Assistance provides assistance for obtaining Food Stamps and Medicaid.

Food Banks are active participants in the local continuum and provide free groceries that oftentimes free up cash resources for rent, transportation and other essential needs. The City has funded the Food Bank with CDBG Public Services funds in the past to assist them in expanding their operational storage facility to meet ongoing and growing needs in the community.

The Salvation Army, St. Vincent de Paul and other faith-based organizations and churches in Billings also offer emergency assistance. Billings has the addition of a faith-based partnership, Interfaith Hospitality Network, to assist in providing assistance to homeless families. The Interfaith Hospitality Network is a unique partnership of area churches designed to assist homeless families by utilizing existing community resources. The churches provide rooms for overnight accommodations, congregations supply volunteers and food, and social service organization assess and refer homeless families to this and various other programs. Because the program utilizes volunteers, it does not accept person with substance abuse or untreated severe mental health issues. The program includes ten host congregations and four supporting congregations. The program does not require clients to attend church services or activities of the host congregation.

Discharge Coordination Policy

The City does not receive McKinney-Vento Homeless Assistance Act funds and is not required to develop and implement a Discharge Coordination Policy. The City supports the Montana Continuum of Care in their efforts to establish a Statewide Discharge Coordination Policy.

The City's Community Development Division staff authored the only ten-year plan to impact homelessness in Montana and is facilitating action plans to implement activities identified in the plans with 50 local service providers.

The City's involvement in supporting homeless initiatives is explained in the Billings FY2013-2014 Annual Action Plan located in the appendices. One of the goals in *Welcome Home Billings* is specifically designed to prevent homelessness by supporting pre-release discharge planning education and intervention for all institutional services including foster care, prison, jail and behavioral health facilities.

Staff is familiar with the State's Discharge Policy, as noted in the State's Annual Action Plan for FY2012-2013 (excerpts on following page).

Discharge Coordination Policy

Montana is committed to the objective of not discharging someone into homelessness. The work of the Governor's Council on Homelessness, coupled with research and outreach, has provided the foundation for a 10-year plan to address homelessness as it exists in Montana and to end chronic homelessness. Although Governor Schweitzer chose not to reinstate the Montana Council on Homelessness after Executive Order 40-2006 expired in 2009, it does not mean overarching efforts to address homelessness in Montana have been abandoned. Although the structure is undergoing some revision, the Governor and the state of Montana remain committed to addressing homelessness by furthering the efforts to meet the goals of the 10-Year Plan.

On a practical level, not discharging someone into homelessness is easier said than done, particularly with the corrections population. Many housing policies preclude serving felons, and federal policy prevents sexual and violent offenders from accessing public housing. This population does not have the resources to pay market rate for their housing, even if they can find someone to rent to them. Add in the lengthy wait for a housing choice voucher, and the problem of not discharging someone into homelessness becomes even more difficult. Unfortunately, the need for housing assistance is so great and the vouchers and public housing resources are so limited, it is rare that someone being discharged from correctional facilities will ever be able to access a voucher. This is particularly difficult when the individual leaving a state corrections facility or county jail is suffering from disabilities, including one or more mental health diagnoses, physical disabilities, PTSD, organic brain damage or co-occurring disorders that make it difficult to self-advocate.

It is also very difficult to find housing for youth coming out of foster care. The Public Health and Human Services Child and Family Services Division has an estimated \$500,000 in John H. Chafee grant funds to provide direct services to assist eligible youth aging out of foster care or who have aged out of foster care. The purpose of these grants is in establishing, maintaining, and/or expanding educational, housing, mentoring, and employment services to current and former foster care youth age 16 to 21 to assist them to achieve self-sufficiency.

In practice, persons with serious mental illnesses who are leaving treatment facilities may be discharged to an emergency shelter (i.e., into homelessness), which can often mean moving to the top of the waiting list for housing, thus being able to access mental health and other services in a more timely way. Without an immediate link to case management, housing providers are reporting that many coming out of homelessness, particularly those who have serious and disabling mental illness (SDMI) have a great deal of difficulty maintaining housing after finding it.

The policy further explains various efforts and recommendations to prevent homelessness through discharge.

Lynda Woods, Community Development Coordinator for the City of Billings, is an active participant in the *Montana Coalition for the Homeless* which supports discharge planning education and outreach efforts for the State of Montana. Representative Ellie Hill, also a member of the Coalition, authored a [legislative bill](#) in 2011 to require discharge planning for individuals released from prison or community corrections programs. Unfortunately, the bill was not passed. The Coalition is also extensively referenced in a [policy brief](#) outlining discharge planning to reduce homelessness which was prepared by University of Montana graduate students. Every effort possible is being made to support discharge planning to eliminate homelessness through the Community Development Division.

City staff homeless impact efforts are also extensively noted in the State's Annual Action Plan for FY12-13:

The work of the Governor's Council on Homelessness, coupled with research and extensive outreach, provided the foundation for Montana's 10-year plan to address homelessness as it exists in Montana, with an emphasis on ending chronic homelessness. Although Governor Schweitzer chose not to reinstate the Montana Council on Homelessness after Executive Order 40-2006, overarching efforts to address homelessness in Montana have not been abandoned. State leaders remain committed to addressing homelessness by furthering the efforts to meet the goals of the 10-Year Plan. The MTCOH Demonstration Project in Billings continues to move ahead with its expensive efforts to address homelessness. To date, these efforts have included Second Chance Homes, housing first apartments, a dedicated VISTA project, a VOA Veterans Transitional Housing project, a very detailed and extensive analysis of local homelessness, including a cost/benefit analysis, social enterprise, and more. This robust effort was the result of some technical assistance by the MTCOH in its first incarnation, coupled with \$300,000 in Food Stamp Bonus Funds that were given by DPHHS on the single condition that they be used to address homelessness in the way that made the most sense to Billings.

- **State/City Partnerships:** The Montana Council on Homelessness (MTCoH), originally comprised of policymakers from state and federal agencies and select community leaders, settled on a state/city partnership approach to addressing homelessness. The Council and its participants agreed that they could offer technical assistance, easy access to policymakers, flexible seed money, staff time and other supports. Billings was selected as the first demonstration city because it had the largest documented community of persons who were homeless and a good service palette. Prior to approaching Billings, the Council Coordinator created Homeless in Billings, a report based partially on data from the Point-in-Time Survey, as a frame of reference on homelessness as it existed in Billings. Leadership, including the Lt. Governor, met with Billings leaders, then convened a series of day-long educational/planning sessions. Each session was attended by approximately 150 people.
- The upshot was the creation of the Billings Mayor's Committee on Homelessness. The Mayor tasked the Community Development Director with providing staff time to the Committee and selected the members from among local leaders and stakeholders. This started and has remained a vibrant committee that includes business leaders, the librarian, nonprofit executives, healthcare professionals, United Way, homeless constituents, representatives of homelessness serving agencies, the housing authority and others. Once the Committee had begun its strategic planning, the State allocated \$300,000 in Food Stamp Bonus funds for use in addressing homelessness in ways the Mayor's Committee deemed most effective. A multi-pronged approach was launched over four years that has resulted in initiatives on multiple fronts. These efforts have been supported by the original seed funds, grants, Community Development Block Grant and HOME funds, private donations and additional resources including Congressional earmarks. The results have been nothing short of remarkable: a Housing First project, a 10-year plan, Second Chance homes, a 10-member VISTA project dedicated to addressing homelessness, a cost-benefit analysis detailing the costs of not addressing homelessness, a vigorous Billings Area Resource Network that functions as the City's Continuum of Care, a transitional housing facility for veterans, social enterprises, an Interfaith Hospitality Network, Project Homeless Connect events and more. (There is a robust website detailing the global initiatives in Billings available at: <http://www.ci.billings.mt.us/index.aspx?NID=637>.)

Please refer to the City's 'robust website detailing the global initiatives in Billings' at www.ci.billings.mt.us/homeless.

Appendix A - SF-424 & Certifications

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Appendix B - Tables 3C

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Appendix C - Public Notices

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Appendix D - Affirmative Marketing Plan

CITY OF BILLINGS

COMMUNITY DEVELOPMENT DIVISION

Affirmative Marketing Plan

Statement of Policy: In accordance with the Affirmative Marketing Regulation of the United States Department of Housing and Urban Development's HOME Investment Partnership program (24 CFR Part 92.351) and in furtherance of the City's commitment to non-discrimination and equal opportunity in housing, the City has established the following procedures to affirmatively market units assisted under the City's Affordable Housing Development program. These procedures are applicable to projects consisting of five or more HOME-assisted units.

Purpose: Provide information to and otherwise attract eligible persons, especially those least likely to apply, from all racial, ethnic, and gender groups in Billings to ensure equal opportunity to housing developed through the City's Affordable Housing Development program.

Methods for Informing the public, owners, and potential tenants about federal fair housing law and the City's Affirmative Marketing efforts:

- Advertise in local newspaper of availability of funding opportunities for housing development.
- Provide brochures with information on HOME program activities made available in the Community Development Division's publically accessible office and on the City's website.
 - Information provided in brochures will be provided in accessible formats upon request.
- Provide brochures with information on HOME program activities are provided to a variety of organizations primarily serving low income, minority, and female-headed households, including:
 - Mayor's Committee on Homelessness
 - Billings Area Resource Network
 - Housing Authority of Billings
 - Neighborhood Task Forces
- Provide fair housing information through the Community Development Divisions publically accessible office and on the City's website.
- Coordinate fair housing education efforts city-wide, as staff resources allow.

Requirements and practices each property owner must adhere to in carrying out Affirmative Marketing procedures to inform and solicit applications from persons in the housing market area who are least likely to apply for housing opportunities without specialized outreach:

- Notify the Housing Authority of Billings about upcoming vacancies prior to utilization of other advertisement methods including posting ads, etc.
- Require a 30-day notice to vacate from tenants intending to voluntarily move from units to assure the Housing Authority of Billings can be notified of the vacancy prior to other public notification efforts.

Records required to document actions taken by the City and property owners to market units:

- The City and property owners will keep documents of all efforts to affirmatively market activities to low income households, including:
 - Date and method of notification to the Housing Authority of Billings regarding vacancies and other forms of advertisement to affirmatively market units.
- Property owners will be required to keep demographic records on race, ethnicity, gender, household income at a minimum for a period of at least five years.

Assessment of the success of affirmative marketing actions and corrective Actions:

- The City will examine records provided by property owners on a routine basis to ensure compliance with the City's Affirmative Marketing plan.
- Corrective action includes, but is not limited to:
 - Providing additional guidance regarding compliance and methods for documenting compliance.
 - Increased audit and review frequency.
 - If lesser corrective actions have not remedied the issue, the City may disqualify the property from further participation in City-funded assistance programs.

Minority & Women Outreach Program

The City of Billings - Community Development Division will oversee an outreach program to ensure inclusion and equal access opportunity in all contracts entered in to by the City in efforts to provide affordable housing, to the maximum extent possible to minorities and women. This program shall include:

- The language, "Minorities and women encouraged to apply" will be included on all program brochures.
- Annual advertisements and Requests for Proposals for contracts will include the above language.
- MBE / WBE reports shall be submitted twice annually, as required.
- The Disadvantaged Business Enterprise Program [website](#) for Montana will be checked for special notifications of contracting opportunities.