

FY2014-2015

Year Five

*of the FY2010-2014  
Consolidated Plan*

# City of Billings Substantial Amendment to Annual Action Plan



December 5, 2014

Community Development Division  
PO Box 1178  
Billings, Montana 59103

DUNS #194782780

[www.ci.billings.mt.us](http://www.ci.billings.mt.us)

406.657.8281

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# Introduction

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The City of Billings is required by the U.S. Department of Housing and Urban Development (HUD) to prepare a Consolidated Plan to address the use of federal funding through the Community Development Block Grant (CDBG) and HOME Investment Partnerships programs (HOME). Focused on CDBG and HOME activities, the Consolidated 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.

## *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.

## *FY2014-2015 Proposed Substantial Amendment*

A substantial amendment to the FY2014-2015 Annual Action Plan / Consolidated Plan requires both a public hearing and action to accept and utilize CDBG and HOME funding as proposed. This amendment to the City of Billings' FY2014-2015 Annual Action Plan documents how the City plans to allocate both repaid funds and program income received during the current fiscal year to previously approved activities.

**Program Income:** Following HUD's review of the City's FY2013-2014 Comprehensive Annual Performance Evaluation Report, staff has been tasked to immediately utilize program income received in both the CDBG and HOME programs. In previous years, City staff has allocated actual program income received during a calendar year to the following fiscal year to rely solely on actual income received. HUD is now requiring the City to estimate and allocate program income in advance of receipt to expeditiously utilize funding as it becomes available to the City.

**HOME Program:** The City is in receipt of \$130,436 in HOME funds which was to be repaid to HUD due to an unsuccessful affordable housing project. HUD representatives have indicated approval of the City's request to deposit these funds in the City's line of credit to be utilized for eligible HOME activities. In addition, the City is amending the FY2014-2015 Annual Action Plan to include the use of an estimated

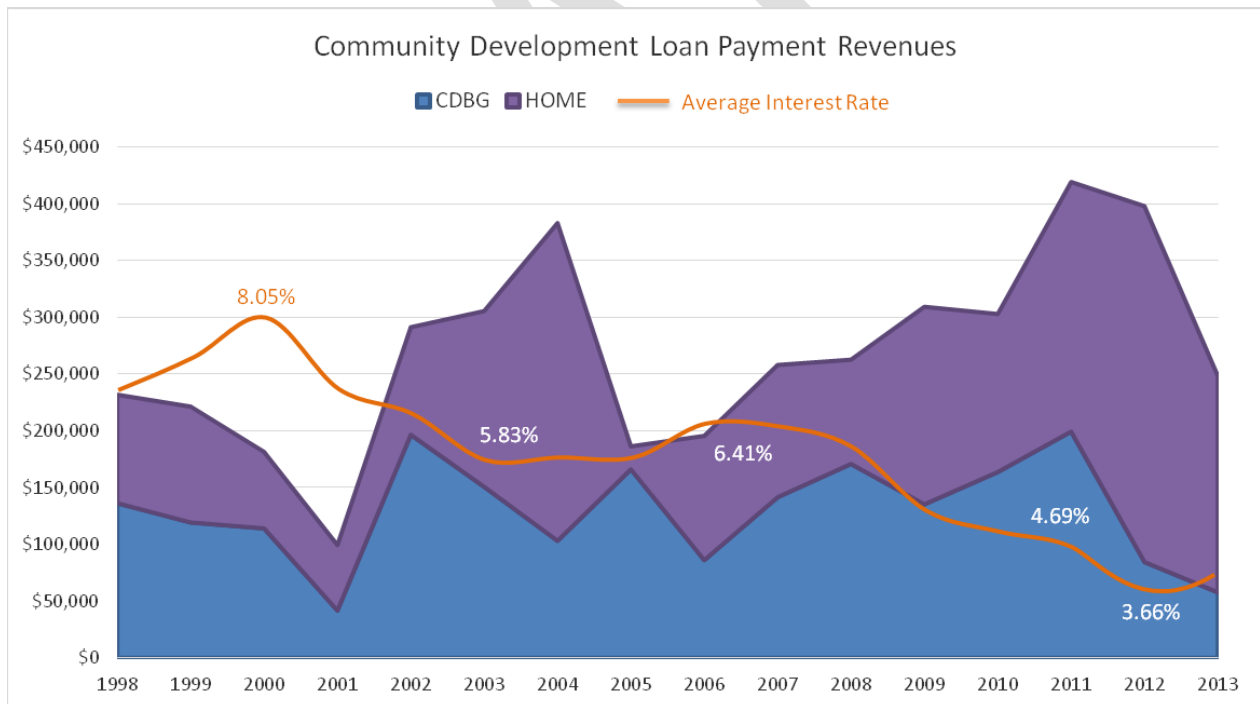
\$250,000 in HOME program income received from July 1, 2014 to June 30, 2015 for eligible activities including First Time Homebuyer and Affordable Housing Development programs.

**CDBG Program:** The City is also proposing to allocate an estimated \$150,000 in CDBG program income received from July 1, 2014 to June 30, 2015 for previously approved and eligible activities as described in the FY2014-2015 Annual Action Plan including Administration, Housing Rehabilitation, Manufactured Home Repair, First Time Homebuyer, Affordable Housing Development and the Billings Metro VISTA Project.

### Estimating Program Income

The City is required to estimate program income for both CDBG and HOME programs in order to plan for expenditures via eligible activities. Program income levels vary greatly from year to year due to many factors, including interest rates to refinance primary mortgages. Revenue increases as interest rates decline.

For example, in 2011 the City received nearly \$200,000 in CDBG revenue and the following year (2012) the City only received \$84,355; a nearly 60% decline. Similar variances have been evident in the HOME program. In 2012, the City received nearly \$400,000 and in 2013 received just under \$250,000. Average program income from 1998 to 2013 is approximately \$130,000 to \$140,000 for CDBG and HOME respectively.



For the purposes of budget planning for core programs, City staff has estimated receipt of \$150,000 in CDBG and \$250,000 in HOME revenue from repaid First Time Homebuyer and Home Repair program loans. Should the City receive program income exceeding these estimates, the funding would be utilized in the same manner described herein for Administration, First Time Homebuyer, Home Repair and Foreclosure programs, Affordable Housing Development and the Billings Metro VISTA Project.

## FY2014-2015 Budget Changes

The original FY2014-2015 budget is shown below:

FY2014-2015 Activity	FY2014-2015 Original Allocations	
	CDBG	HOME
CDBG Administration	\$118,175	-
HOME Administration	-	\$30,171
Community Housing Development Organization (CHDO) Set-Aside	-	\$45,257
Affordable Housing Development	\$0	\$55,000
First Time Homebuyer	\$0	\$542,008
Housing Rehabilitation Loans	\$375,176	-
Manufactured Home Repair	\$50,000	-
Foreclosure Acquisition & Rehabilitation	\$0	-
Billings Metro VISTA Project	\$50,000	-

Allocations of FY2014-2015 CDBG and HOME revenue will be managed as follows:

- **Administration:** Up to 20% of new CDBG and 10% of HOME program income may be used to support administrative costs. Recaptured / repaid HOME funds may not be utilized to support HOME administration.
- **CHDO Set Aside & Affordable Housing Development:** Additional HOME funds may be utilized to increase the CHDO reserve fund for a shovel-ready project. CDBG and HOME funds may also be allocated to the Affordable Housing Development program to support a shovel-ready project. Approval for a specific developer to undertake a project through this program requires City Council approval.
- **First Time Homebuyer:** Additional HOME and CDBG funds may be utilized to provide financing to low income families to purchase their first home. Funds will be allocated based on close-ready status.
- **Home Repair Programs:** Additional CDBG funds may be utilized to provide financing to low income families to make needed repairs to their homes in Housing Rehabilitation or Manufactured Home Repair programs. Funds will be allocated based on close-ready status.
- **Foreclosure Acquisition & Rehabilitation:** Additional CDBG funds may be utilized to provide funds to acquire and rehabilitate vacant and foreclosed properties to sell to low income households. Funds will be allocated on a close-ready basis.
- **Billings Metro VISTA Project:** Up to 15% of the previous year's CDBG funds may be allocated to this Public Service activity to assist non-profit organizations in building capacity needed to impact poverty and homelessness. The City's new CDBG entitlement grant totaled \$556,352 and the City received program income in FY2013-2014 totaling \$57,637; overall total is \$613,989. Fifteen percent of this totals \$92,098 as an allocation maximum for this Public Service activity.

The geographic area covered in the Action Plan and amendment is the City of Billings municipal boundaries. The City intends to utilize grant funding in a manner that complies with regulations established by HUD, including the commitment and expenditure of funds in a timely manner.

## *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 projects to expend funds rapidly.
- Prioritizing projects 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.

## *Citizen Participation*

The Citizen Participation Plan for the City of Billings is designed to assure citizen involvement in the planning and reporting on the City's programs covered under HUD's Consolidated Plan requirements. The purpose of the Citizen Participation Plan is to assure 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.

The primary objectives of the Community Development Division's Consolidated and Citizen Participation Plans are to:

- Encourage citizen participation in the development of the Consolidated Plan, Consolidated Plan Amendments 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, 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, Amendments, the Citizen Participation Plan and the CAPER.
- Finalize consultation with the Billings Housing Authority on the development and implementation of the Consolidated Plan and amendments to 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 the 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 shall be provided in areas where accommodations for the disabled can be provided.

The City will hold a public hearing on January 12, 2015 during the City Council meeting at 6:30pm, in order to hear public comments and to approve the City's proposed use of CDBG and HOME funding. Public notices announcing the proposed use of CDBG and HOME funding have been published on December 4, 11 and 18, 2015. The public comment period will be held from December 5, 2014 through January 12, 2015.

Comments received during the public hearing held on January 12, 2015 included...

...comments were submitted to the Community Development Division. The drafted Substantial Amendment was published on the City of Billings - Community Development website located here: [www.ci.billings.mt.us/CDreports](http://www.ci.billings.mt.us/CDreports).

# Consolidated Planning

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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 an amendment to the City's one-year Annual Action Plan for FY2014-2015 which identifies goals and strategies to be undertaken from July 1, 2014 through June 30, 2015. A more detailed presentation of needs and overarching strategies is described in the five-year plan. The Annual Action Plans describe identified resources to be utilized during the program years, which are 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 Annual Action Plans for FY2014-2015 followed development processes 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 FY2014-2015 Annual Action Plan was open for public comment extending from March 28, 2014 through April 28, 2014. A public hearing was held on April 28, 2014 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 28, 2014.

## 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.

Strategy	Objective	Activity	Measurement Type	FY14-15 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	15 17 with amendment
		Manufactured Home Repair Loan Program	Housing Units	5 6 with amendment
		Foreclosure Acquisition / Rehabilitation Loan Program	Housing Units	1 2 with amendment
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 5 CHDO Units with amendment
	Provide affordable financing and support to promote homeownership opportunities citywide.	First Time Homebuyer Program	Households	40 48 with amendment
		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	Monthly Meetings	6 Full Committee 6 Sub-Committee
		Assist in the implementation of Welcome Home Billings, the City's ten-year plan to impact homelessness.	Completed Staff Action Plan FY2014-15	1
			Completed Performance Report FY2013-14	1
Facilitate AmeriCorps VISTA application and pursue project status		Annual submission of VISTA grant application / VISTA member placements	1 Application 23 VISTA Members 500 people with amendment	
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

## *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.

## *Current Programs*

The City of Billings currently manages the following programs: First Time Homebuyer, Housing Rehabilitation, Manufactured Home Repair, Foreclosure Acquisition / Rehabilitation, Affordable Housing Development and the Billings Metro VISTA Project. The Community Development Division's website is located here: [www.ci.billings.mt.us/comdev](http://www.ci.billings.mt.us/comdev).

The following community organizations are supported by the Community Development Division:

- **Affordable Housing Task Force** – advisory board made up of housing developers, realtors, lenders and other housing professionals, meet monthly
- **Billings Partners for American Indian Homeownership**
- **Mayor's Committee on Homelessness**

The City's latest Analysis of Impediments to Fair Housing Choice, Housing Needs Assessment, Consolidated and Annual Action Plans can be viewed online at [www.ci.billings.mt.us/CDreports](http://www.ci.billings.mt.us/CDreports).

## *Community Development Contact Information*

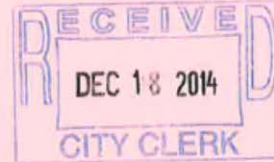
The Community Development Division is located on the 6<sup>th</sup> floor of the Miller Building, 2825 3<sup>rd</sup> Avenue North, Billings, Montana. Additional information can be obtained by visiting the office or by contacting:

Brenda Beckett  
Community Development Manager  
(406) 657-8286  
[beckettb@ci.billings.mt.us](mailto:beckettb@ci.billings.mt.us)

# Public Notices

IN THE MATTER OF

NOTICE OF PUBLIC HEARING  
 City of Billings  
 Substantial Amendment to FY2014-2015  
 Consolidated Plan - Annual Action Plan  
 for Community Development Block Grant  
 (CDBG) and HOME Programs



The City of Billings will hold a Public Hearing on a substantial amendment to the FY2014-2015 Consolidated Plan - Annual Action Plan for CDBG and HOME funding on January 12, 2015 during the City Council meeting at 6:30pm in City Council Chambers located at City Hall, 210 North 27th Street, Billings, Montana.

**AFFIDAVIT  
 of  
 PUBLICATION**

The City of Billings is proposing to allocate \$130,436 in repaid HOME funds for eligible activities including First Time Homebuyer and Affordable Housing Development programs. The City is also proposing to allocate estimated \$150,000 in CDBG and \$250,000 in HOME program income received from July 1, 2014 to June 30, 2015 for previously approved and eligible activities as described in the FY2014-2015 Annual Action Plan including Administration, Housing Rehabilitation, Manufactured Home Repair, First Time Homebuyer, Affordable Housing Development and the Billings Metro VISTA Project.

STATE OF MONTANA            )  
   :  
   )    ss  
 County of Yellowstone        )

Scott R. Turner, being first duly sworn, deposes and says that the:

Notice of Public Hearing - CDBG & HOME

a copy of which is hereto attached, was published in the regular and entire issue of The Billings Times, a weekly newspaper of general circulation published every Thursday in the City of Billings, County of Yellowstone, State of Montana, for 3 issues, commencing on the 4th day of December, 2014, and ending on the 18th day of December, 2014.

STATE OF MONTANA            )  
   :  
   )    ss  
 County of Yellowstone        )

On this 18th day of December, 2014, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Scott R. Turner, known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same and after being first duly sworn, deposed and stated that the matters and things contained therein are true of his own knowledge.

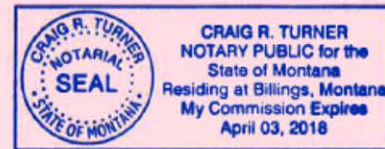
IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal the day and year in this certificate first above written.

The purpose of the public hearing, in compliance with applicable U.S. Department of Housing and Urban Development requirements is to obtain comments on the substantial amendment for the change in program allocation for CDBG and HOME funding.

The City of Billings' drafted substantial amendment will be available for review on December 5, 2014 at the Community Development office on the sixth floor of the Miller Building, 2825 3rd Avenue North, Billings, MT and will also be posted on the City's website at [www.ci.billings.mt.us/conplan](http://www.ci.billings.mt.us/conplan). Public comments on the substantial amendment will be accepted from December 5, 2014 to January 12, 2015. Additional information regarding the amendment can be obtained by contacting Brenda Beckett in the Community Development office at 406-657-8286 or via email at [beckettb@ci.billings.mt.us](mailto:beckettb@ci.billings.mt.us).

The public hearing is accessible to individuals with physical disabilities. Special arrangements for participation in the public hearings by individuals with hearing, speech, or vision impairment may be made upon request at least three days prior to the hearing.

Dated this 4th day of December 2014.  
 Cari Martin  
 City Clerk  
 City of Billings  
 P.O. Box 1178  
 Billings, MT 59103  
 (December 4, 11, 18, 2014)



# Community Development Board Approval

**MEMO**

DATE: December 9, 2014

TO: Community Development Board

FROM: Brenda Beckett, Manager

RE: Substantial Amendment to the FY2014-2015 Annual Action Plans / Consolidated Plan for Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME)



**PROBLEM/ISSUE STATEMENT:** The City is in receipt of \$130,436 in HOME funds which was to be repaid to the U.S. Department of Housing and Urban Development (HUD) due to an unsuccessful affordable housing project. HUD representatives have indicated approval of the City's request to deposit these funds in the City's line of credit to be utilized for eligible HOME activities.

In addition, HUD has recently reviewed the City's FY2013-2014 Comprehensive Annual Performance Evaluation Report and has requested immediate use of program income in both the CDBG and HOME programs. In previous years, City staff has allocated actual program income received during a calendar year to the following fiscal year to rely solely on actual income received. HUD is now requiring the City to estimate and allocate program income in advance of receipt to expeditiously utilize funding as it becomes available to the City.

Therefore, staff is proposing amending the FY2014-2015 Annual Action Plan to include the use of any and all revenue received from July 1, 2014 to June 30, 2015 for eligible activities, estimates are as follows:

- \$250,000 in HOME program income received to support administration, First Time Homebuyer and Affordable Housing Development programs.
- \$150,000 in CDBG program income received to support administration, Housing Rehabilitation, Manufactured Home Repair, First Time Homebuyer, Affordable Housing Development and the Billings Metro VISTA Project.

A substantial amendment to Annual Action Plan / Consolidated Plan requires both a public hearing and action to accept and utilize CDBG and HOME funding as proposed. The amendment will be reviewed at City Council on January 12, 2015 following a 30+ day public comment period beginning on December 5, 2014.

**ALTERNATIVES ANALYZED:** 1) Amend the FY2014-2015 Annual Action Plan to utilize CDBG and HOME revenue and program income in currently approved programs; 2) Do not amend Annual Action Plan to utilize the funding.

**FINANCIAL IMPACT:** This change in budgeting procedures will assist City staff in meeting HUD compliance in utilizing revenue received prior to drawing entitlement funding.

**RECOMMENDATION:** Staff recommends that the Community Development Board approve the proposed Substantial Amendment to the FY2014-2015 Annual Action Plan to allocate CDBG and HOME revenue to eligible projects as described.

Recommend Approval: Kamber Kelly, Chair (Kamber Kelly)  
CD Board

Staff Attest: Brenda Beckett

# City Council Approval

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DRAFT