CITY OF BILLINGS

Comprehensive Annual Performance Evaluation Report

FY2017-2018

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Community Development Division
2825 Third Avenue North
Billings, Montana 59101
406.657.8281
www.CityofBillings.net/ComDev
www.CityofBillings.net/CDreports

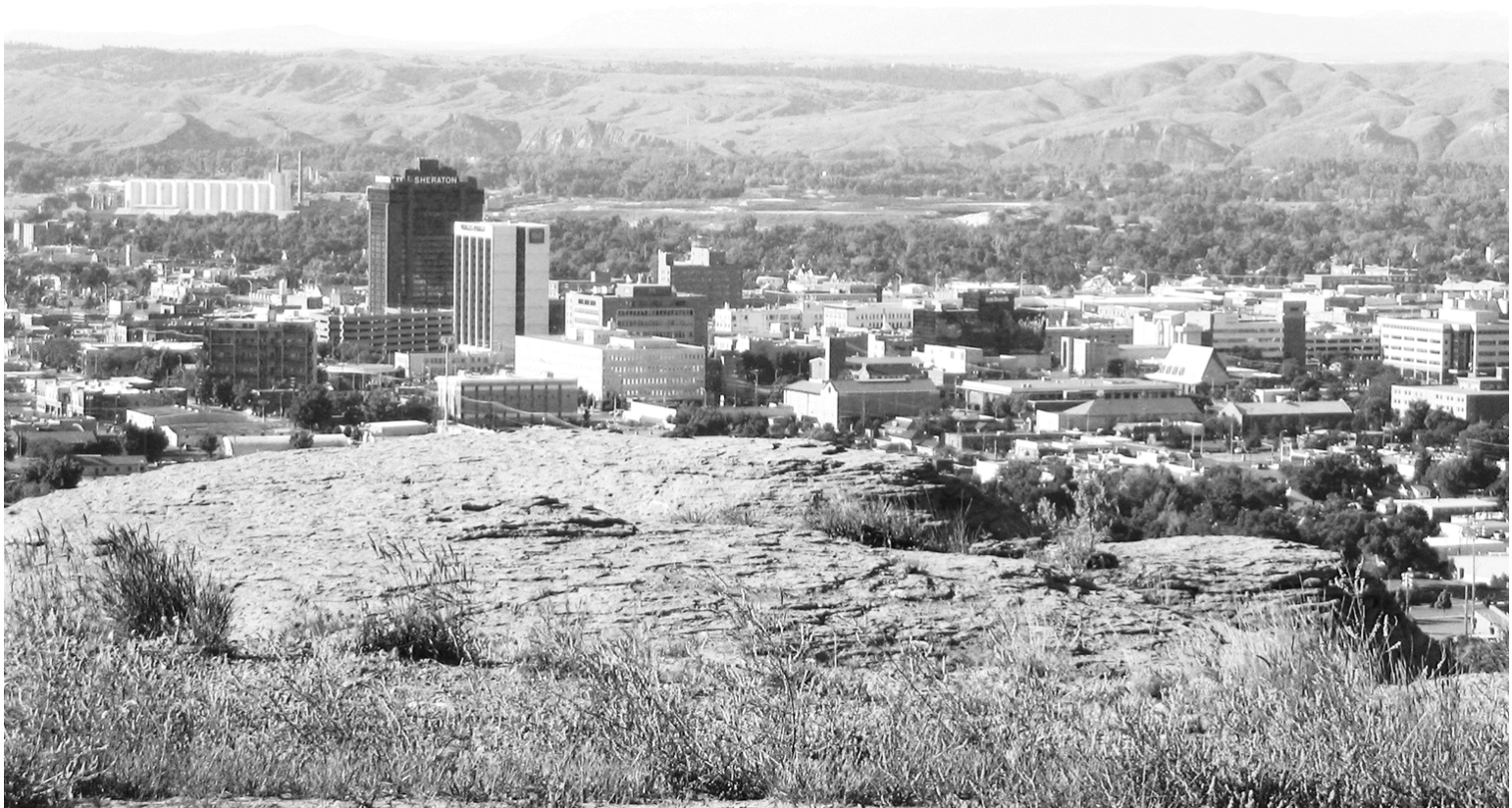

Table of Contents

CR-05: Goals and Outcomes 2

Table 1: Accomplishments - Strategic Plan to Date and Program Year 4

CR-10: Racial and Ethnic Composition of Families Assisted 6

Table 2: Table of Assistance to Racial and Ethnic Populations by Source of Funds 6

CR-15: Resources and Investments 10

Table 3: Resources Made Available 10

Table 4: Identify the Geographic Distribution and Location of Investments 10

Table 5: Fiscal Year Summary - HOME Match Report 12

Table 6: Match Contribution for the Federal Fiscal Year 13

Table 7: HOME Program Income 14

Table 8: Minority Business and Women Business Enterprises 14

Table 9: Minority Owners of Rental Property 14

Table 10: Relocation and Real Property Acquisition 14

CR-20 Affordable Housing 16

Table 11: Number of Households 16

Table 12: Number of Households Supported 16

Table 13: Number of Persons Served 17

CR-25 Homeless and Other Special Needs 19

CR-30 Public Housing 23

CR-35 Other Actions 24

Analysis of Impediments to Fair Housing Choice Matrix 30

CR-40 Monitoring 33

CAPER Outreach Chart 35

CR-45 CDBG 37

CR-50 HOME 38

Attachments

A - Public Notice 41

B - Section 3 Reports 43

IDIS Reports - PENDING

PR03: CDBG Activity Summary Report

PR05: Drawdown Report by Project and Activity

PR07: Drawdown Report by Voucher Number

PR09: Receipt Fund Type Detail Report

PR22: Status of HOME Activities - Entitlement

PR23: CDBG / HOME Summary of Accomplishments

PR25: Status of CHDO Funds by Fiscal Year Report

PR26: CDBG Financial Summary Report

PR27: Status of HOME Grants - Entitlement

PR33: Home Matching Liability Report

PR49: HOME Deadline Compliance Status Report

DRAFT

CR-05 Goals and Outcomes

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

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

Introduction

Presented herein is the City of Billings FY2017-2018 Comprehensive Annual Performance and Evaluation Report (CAPER) for the federally funded Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). Both CDBG and HOME funds were granted to the City of Billings as an entitlement community through the United States Department of Housing and Urban Development (HUD).

The CAPER covers a program year beginning on July 1 to June 30 and it illustrates the City's progress in meeting goals established in the five-year Consolidated Plan and the Annual Action Plan. The City of Billings - Community Development Division manages several programs to meet the goals of the Consolidated Plan and the Annual Action Plan. Funding for each program is allocated on a shovel- and close-ready basis in order to ensure efficient use of funds.

Public Comment

The public comment period for this CAPER exceeded the 15 day minimum; it began on September 8 and ended on September 24, 2018. The Billings City Council also held a public hearing to take comments on accomplishments represented in the CAPER. Notice of the public comment period and hearing was published in the Yellowstone County News for three consecutive weeks.

Public comment during the hearing is as follows…pending.

Progress Assessment

The City of Billings met most of the goals established for both the Consolidated and Annual Action Plan. Each of the City's highest priorities and activities are listed below, along with accomplishments for each program.

Affordable Housing Preservation

- **Housing Rehabilitation:** Four low income households were assisted with financing to carry out major home repairs. This program is being revamped to increase use and efficacy following a slower construction season and difficulty in gaining contractor compliance with registration through the System for Award Management (SAM). Extensive marketing and outreach activities have been conducted and a good number of applications have been processed.
- **Foreclosure Acquisition / Rehabilitation:** One property has been purchased, rehabilitated and sold to a low income household. Two additional properties have been purchased and construction is underway on both.

New Affordable Housing Opportunity

- **Affordable Housing Development:** The City of Billings has executed a written agreement with NeighborWorks Montana, a certified Community Housing Development Organization (CHDO), to build two new homeownership housing units - Riverfront Point II. Construction has begun and the units will be sold to income-eligible households next fiscal year. The City has met the annual goal to allocate at least 15 percent of new HOME funds to CHDO activities.
- **First Time Home Buyer:** A total of 59 households were assisted with down payment and closing

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costs through HOME and CDBG programs. Ten additional households were assisted with a City Council non-federal contribution to Community Development housing programs, bringing the total number of households assisted to 69. This is the highest annual number of households ever served in the City's First Time Home Buyer program.

Poverty Impact

- **Billings Metro VISTA Project:** Several AmeriCorps Volunteers in Service to America (VISTA) members were dedicated to impacting poverty and homelessness in Billings. Overall, the project provided education, housing, health and social services to 508 individuals in the Billings area.

The following table compares proposed and actual outcomes for the FY2015-2019 Consolidated Plan *(Expected / Actual Strategic Plan)* and the FY2017-2018 Annual Action Plan *(Expected / Actual Program Year).*

DRAFT

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. *91.520(g)*

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Table 1 - Accomplishments –Strategic Plan to Date and Program Year

Goal	Category	Source / Amount*	Indicator	Unit of Measure	Expected Strategic Plan	Actual Strategic Plan	% Complete	Expected Program Year	Actual Program Year	% Complete
					FY2015-2019			FY2017-2018		
Affordable Housing Preservation	Affordable Housing	CDBG: $1,797,516 HOME: $0	Homeowner Housing Rehabilitated	Household Housing Unit	31	**16**	51.6%	6	**5**	83%
New Affordable Housing Opportunity	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	CDBG: $0 HOME: $1,298,722	Rental units constructed	Household Housing Unit	0	**0**	-	0	**0**	-
			Homeowner Housing Added	Household Housing Unit	4	**2**	50%	0	**0**	-
			Direct Financial Assistance to Homebuyers	Households Assisted	175	**174**	99.43%	20	**69**	345%
Poverty Impact	Poverty Impact	CDBG: $339,329 HOME: $0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2,000	**1,898**	94.9%	200	**508**	254%

Staff Note: HUD's Integrated Disbursement and Information System (IDIS) screen shows as Table 1 - Accomplishments - Program Year and Table 2 - Accomplishments - Strategic Plan to Date

**Monetary figures in this chart represent the estimated investment of CDBG and HOME funds noted in the Consolidated Plan for a five-year period.*

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

The City of Billings utilizes CDBG funds to address low income housing needs through home repair, home buyer, and affordable housing development programs. The City also supports a public service activity to assist nonprofit organizations in meeting the needs of those experiencing homelessness and / or poverty. The following priorities have been identified as specific objectives and are included in the Consolidated Plan.

Affordable Housing Preservation: The use of CDBG funds to preserve existing housing positively influences housing accessibility and affordability for current low income home owners and potential homebuyers. Nearly 10,000 households in Billings have one or more housing problems. The majority of homeowners are cost burdened; paying greater than 30% of household income for housing expenses. Additional funding to maintain or improve their homes is, often times, out of reach.

New Affordable Housing Opportunity: Using CDBG funds to create low income housing opportunities improves access to, and the quality of, the affordable housing stock. Low income households need access to affordable housing and there are a limited number of housing units available, as indicated in the Consolidated Plan's Market Analysis. In addition, the Consolidated Plan's Needs Assessment indicates the majority of homeowners and renters are cost burdened; paying greater than 30% of household income for housing expenses. The number of people in need is rising, including the homeless, the elderly, and the disabled.

Poverty Impact: The number of people experiencing poverty and homelessness is rising in Billings. As noted in the Consolidated Plan's Needs Assessment, there are over 700 people experiencing homelessness in Billings at any one point in time. From 2005 through 2008, the average number of people experiencing homelessness was significantly smaller at 600 people.

Nonprofit social service organizations greatly benefit from the use of CDBG funds to support the Billings Metro VISTA Project. VISTA members work to alleviate poverty through the expansion or improvement of services such as housing, healthcare, education, employment, and financial literacy to alleviate poverty conditions for very low income citizens.

Housing Choice: While not funded through CDBG or HOME funds this fiscal year, expanding housing choice is an important goal for the City of Billings - Community Development Division. Enhancing housing choice for existing and potential new residents fosters stable, socio-economically diverse neighborhoods citywide.

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CR-10 Racial and Ethnic Composition of Families Assisted

Describe the families assisted (including the racial and ethnic status of families assisted). *91.520(a)*

Race / Ethnicity	CDBG	HOME	Non-Federal	Totals
White	310	26	10	346
Black or African American	16			236
Asian				
American Indian or American Native	173	4		
Native Hawaiian or Other Pacific Islander				
American Indian and Black				
Multi-Racial	43			
Totals	**542**	**30**	**10**	**582**
Hispanic	22	0	0	22
Not Hispanic	520	30	10	560

Table 2 – Table of assistance to racial and ethnic populations by source of funds

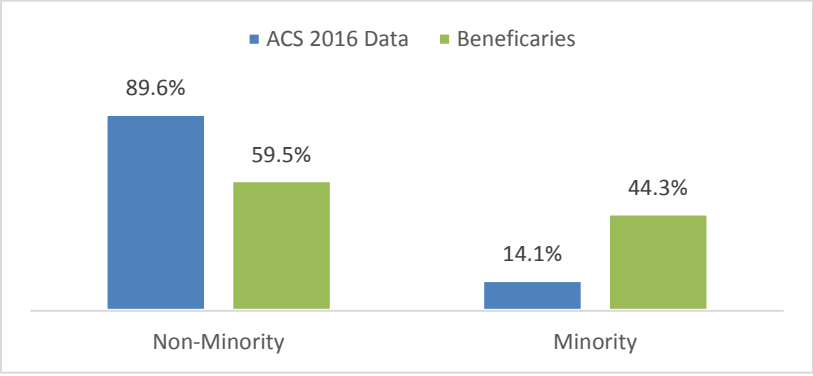
Narrative

The City assisted a total of 572 beneficiaries with CDBG and HOME this fiscal year. Ten additional households were assisted with non-federal funds in the First Time Home Buyer program, bringing the total beneficiaries served to 582.

236 out of 582 beneficiaries self-reported they were a racial minority; just over 40 percent of the total number of people served through the Community Development Division. Twenty-two people reported that they were Hispanic; four percent of the total number of beneficiaries.

Special Categories		CDBG	HOME	CDBG / HOME Totals	Non-Federal	Totals All Programs
Single Head of Household	Female	21	12	33	6	**39**
	Male	2		2	1	**3**
Disabled		39	2	41	0	**41**
Elderly		54	3	57	0	**57**

Out of the total 582 beneficiaries assisted, 42 were single head of households (over seven percent), 41 self-reported disabilities (seven percent) and 57 were elderly (just under ten percent). *Please note, the above charts were adapted from HUD's IDIS system as IDIS does not include a category for multi-racial beneficiaries or totals.*



The 2010 Census and 2016 American Community Survey (ACS) estimates indicate a 14.1 overall percent minority rate in Billings, including Hispanics. Over forty-four percent of the City's beneficiaries were racial and ethnic minorities this past fiscal year when calculated using category percentages collectively.

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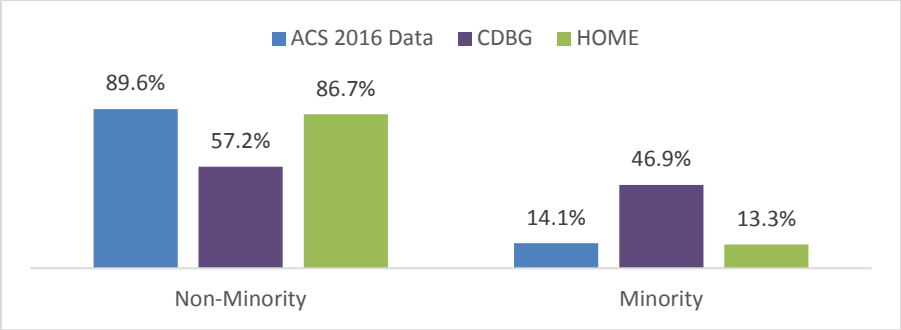
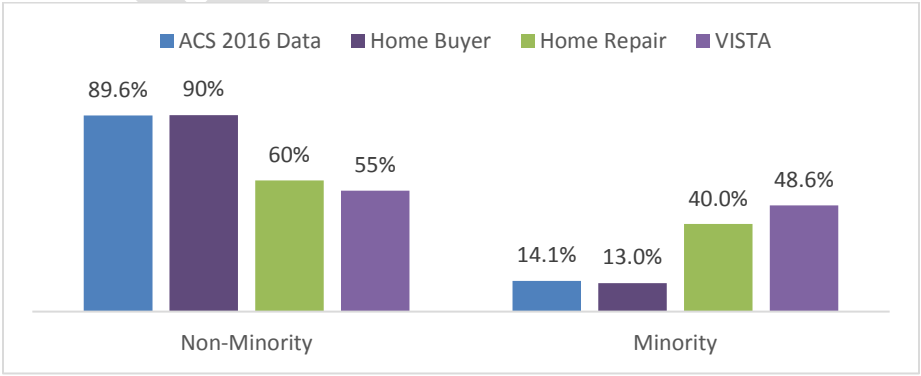
Beneficiaries by Program and Funding Source									
Race / Ethnicity		Home Buyer			Housing Development	Home Repair	Foreclosure	VISTA	Totals
		CDBG	HOME	City*	HOME	CDBG	CDBG	CDBG	
White		26	26	10		2	1	281	**346**
Black or African American								16	**16**
Asian									
American Indian or American Native		1	4			1		171	**177**
Native Hawaiian or Other Pacific Islander									
American Indian and Black									
Multi-Racial		2				1		40	**43**
Subtotals		**29**	**30**	**10**		**4**	**1**	**508**	**582**
Totals		**69**				**4**	**1**	**508**	
Hispanic		2				0		20	**22**
Not Hispanic		27	30	10		4	1	488	**560**
Special Populations		Home Buyer			Housing Development	Home Repair	Foreclosure	VISTA	Totals
		CDBG	HOME	City*	HOME	CDBG	CDBG	CDBG	
Single Head of Household	Female	4	12	6		2	1	14	**39**
	Male	2		1					**3**
Disabled Households			2				1	38	**41**
Elderly			3					54	**57**

**Non-federal funds dedicated by the City of Billings*

Demographics by Funding Source: The 2016 ACS data indicates an approximate 14 percent minority rate. Approximately 47 and 13 percent of CDBG and HOME beneficiaries were minorities this fiscal year, respectively.



Demographics by Program: Although the First Time Home Buyer program only served nine racial / ethnic minority households, the total percentage of minority households is similar to the ACS overall percentage (14.1 ACS percent compared to 13 percent home buyer). Forty percent of the home repair / foreclosure program households were racial / ethnic minorities (two of five total households). Just under 49 percent of the Billings Metro VISTA Project beneficiaries were racial / ethnic minorities (247 minority beneficiaries out of 508 total beneficiaries).



Ongoing Marketing: The Community Development Division staff makes concerted efforts to market available programs and opportunities to attract minorities, the disabled and female-headed households to participate. The **Montana Relay 711** phone number is placed on all City correspondence, publications, notices, and on program brochures. Information on home repair and purchase programs is continually available via the City of Billings website (www.CityofBillings.net/homebuyer and www.CityofBillings.net/homerepair), at the Community Development office, the City's Building Division and the Billings Home Center.

Community Outreach: Staff participates and facilitates many community events to promote home buyer / repair programs and contractor opportunity, including the *Phillips 66 Meet in the Park* event held each September in South Park, a lower income neighborhood. The South Side Neighborhood has high concentrations of low income, racial / ethnic minorities, and female-headed households.

City staff has contacted seven mobile home park managers to distribute brochures on home buyer / repair programs and contractor opportunity. Staff also provided a contractor's ad to two local title companies who manage rehabilitation accounts for various construction agencies.

Each spring, staff presents information on the Consolidated Plan, housing programs, contractor opportunity, and to garner feedback on federal funding allocations to Neighborhood Task Forces representing low income communities. Home buyer / repair brochures, contractor opportunity, and marketing materials are provided to the Office of Indian Education for distribution during their Native Family Nights. Materials are also provided to the Indian Health Board.

Staff conducted workshops on the City's housing programs and contractor opportunity at the *Senior & Community Center* and has manned a booth at a *Community Resource Fair*, which allowed one-on-one interactions with participants. Both events are held in the North Park neighborhood, which is highly concentrated with low income and minority households. Postcards advertising contractor opportunity are also printed and distributed to the City's Building Division for display on their front counter.

Advertising: Print advertisement for home buyer / repair programs and contractor ads have appeared in multiple publications including the Tidbits of Billings, Generation Link, the CityLink, and the Senior News. Online banner ads have been placed in the Billings Gazette to be displayed on their website. A full-color insert was enclosed in more than 35,000 utility bills and direct mailed to City residents.

Marketing and Outreach Results: The City received 127 applications for home buyer / repair programs (see chart below). Nineteen total applicants self-identified as racial or ethnic minorities (15 percent). The City has registered new contractors to assist with the home repair programs. This is a significant achievement as the home repair programs has very low outcomes due, in part, to lack of contractor engagement. The public utilities mailer resulted in the highest number of responses and requests for more information on the City's home buyer and repair programs. Application denials are typically due to Area Median Income limits for both home buyer and repair programs.

All Applicants by Program and Funding Source				
Race / Ethnicity		Home Buyer	Home Repair	Totals
White		93	19	112
Black or African American				
Asian				
American Indian or American Native		10	1	11
Native Hawaiian or Other Pacific Islander				
American Indian and Black				
Multi-Racial		3	1	4
Totals		**106**	**21**	**127**
Hispanic		4	0	4
Not Hispanic		102	21	123
Special Populations		Home Buyer	Home Repair	Totals
Single Head of Household	Female	51	5	56
	Male	7	2	9
Disabled Households		4	8	12
Elderly		3	6	9

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CR-15 Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	HUD	$931,593	$1,041,884
HOME	HUD	$586,106	$543,291

Table 3 - Resources Made Available

Narrative

Resources Made Available

- **CDBG:** New CDBG entitlement funds totaled $597,181 and program income received during the fiscal year totaled $334,412. The City of Billings had a total of $931,593 in CDBG funds available this fiscal year.
- **HOME:** New HOME entitlement funds totaled $273,573 and recaptured funding and other HOME revenues totaled $312,534 ($27,990 in program income and $284,544 in recaptured funds). The City of Billings had a total of $586,106 available in HOME funds this fiscal year.

Amount Expended During Program Year

- **CDBG:** Expenditures in entitlement and program income funds totaled $1,041,884 this fiscal year. This included funding allocated in previous fiscal years that was expended this year. This year's timeliness ratio was **1.03** as measured on May 2, 2018; well below the maximum 1.5 ratio.
- **HOME:** Expenditures in entitlement and program income funds totaled $543,291 this fiscal year. This included funding allocated in previous fiscal years that was expended this year.

As required by HUD, City staff ensures the use of currently available program income prior to drawing down entitlement funds in the CDBG program.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	100%	100%	City of Billings Limits

Table 4 – Identify the geographic distribution and location of investments

Narrative

As per findings and recommendations from the City's Analysis of Impediments to Fair Housing Choice, the investment of federal funds is not distributed to a specific geographical location in Billings. The City of Billings utilizes federal funding on a citywide basis, targeting qualified low income households for investment and programs.

Priorities for funding are based on both the most recent Needs Assessment in this Consolidated Plan and the Analysis of Impediments to Fair Housing Choice, completed in 2013. 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.
- Strategies encourage the distribution of resources citywide to support affirmatively furthering fair housing, equal opportunity, and the avoidance of segregation in Billings.

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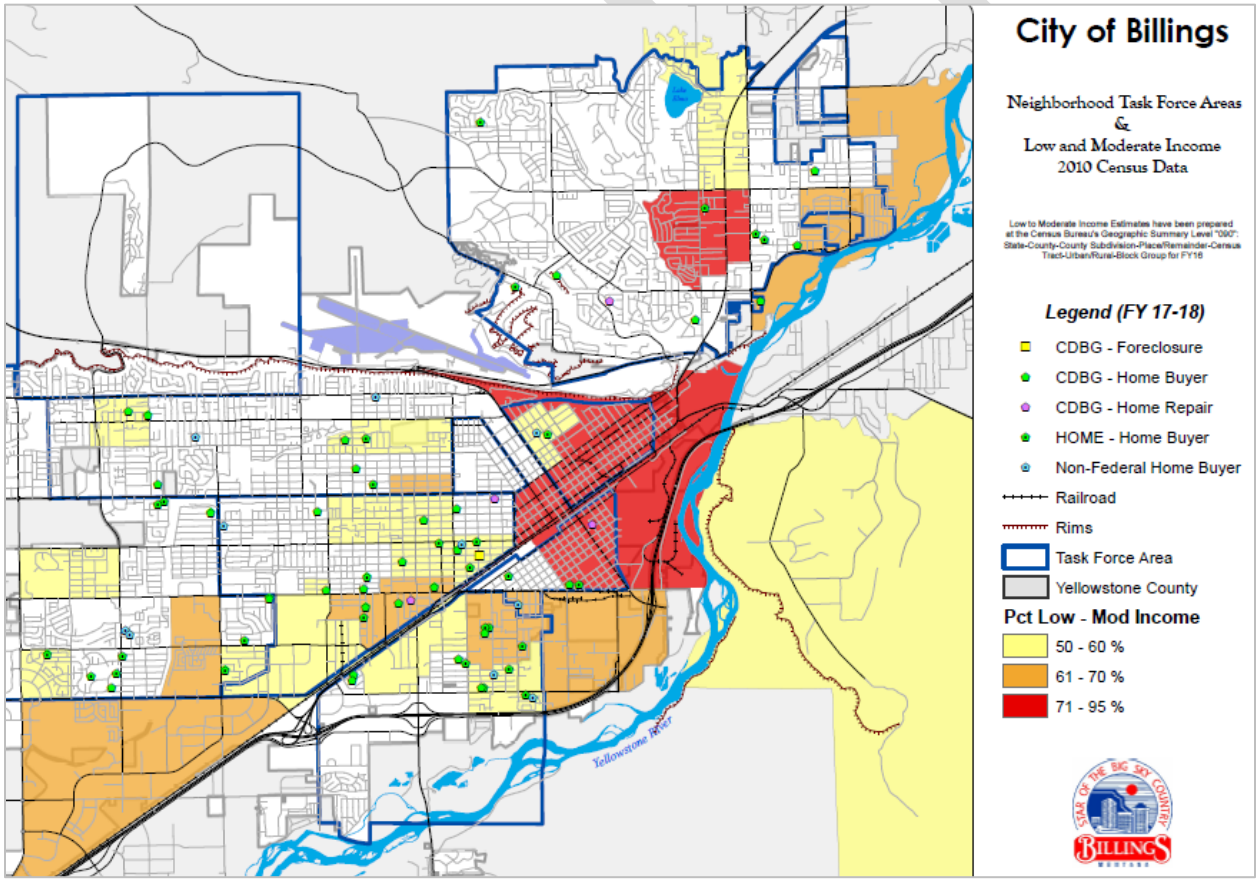
- The description for geographic distribution includes the focus of resources on a citywide basis to support diversity across the community.
- The City of Billings is classified as a smaller city on a national scale.
- The preliminary dollar amount dedicated to each program is included in the Annual Action Plan.

The City has focused 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 (IDIS) 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 has dedicated zero percent of funding to target areas in favor of supporting a citywide approach to further fair housing, equal opportunity and anti-segregation efforts.

The following map clearly illustrates the disbursement of federal investments to promote equal opportunity in all neighborhoods for the City's home buyer, repair and foreclosure programs for this fiscal year. No indirect activities, such as sidewalk / infrastructure repair, were undertaken this fiscal year.



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

Publically-Owned Land:

The requirements set forth in CFR 24 91.220 and 91.520 are as follows:

- Where the jurisdiction deems it appropriate, the jurisdiction *may* indicate publicly owned land or property located within the jurisdiction that *may be used* to address the needs identified in the plan.
- The performance report must include a *description of the resources made available*, the investment of available resources, the geographic distribution and location of investments, the families and persons assisted (including the racial and ethnic status of persons assisted), actions taken to affirmatively further fair housing, and other actions indicated in the strategic plan and the action plan.

The City of Billings does not have plans to use publicly owned land to address needs identified in the Consolidated Plan. However, the Billings City Council supported the Community Development Division's housing programs by dedicating $250,000 in non-federal funds in 2013. The City Council recently dedicated an additional $195,321 in non-federal funding to further the City's housing programs. The City's generous and dedicated financial support should be recognized, even if the City does not use publicly owned land to support the Consolidated Plan.

Overall Leveraging: The City continually makes strides in obtaining other public and private resources to address identified needs. The total leveraging for CDBG and HOME this fiscal year is $11,402,198 which calculates to a leveraging ratio of 1:13. Included in this figure are the following notable leveraging resources:

- **Montana Board of Housing (MBOH) and Lender Financing:** $10,542,063 in loans secured in conjunction with its First Time Home Buyer and Foreclosure programs. Several lenders also offer below-market, fixed interest rates for low income homebuyers.
- **AmeriCorps VISTA:** This fiscal year, VISTA members generated $313,623 in cash and in-kind contributions and the City garnered an additional $522,962 to support the program.

Since 2005, City staff has generated an additional $6,952,141 in cash and grant awards (outside of CDBG and HOME) to further goals developed in the City's Consolidated Plans. This includes significant funds to further fair housing education through the Fair Housing Initiative Programs.

HOME Leveraging: The HOME program requires 25 percent 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 Home Buyer loans issued through private lenders and the MBOH and matching funds provided for other affordable housing projects undertaken with HOME funds, such as private contributions.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	$5,561,109
2. Match contributed during current Federal fiscal year	$717,083
3 .Total match available for current Federal fiscal year (Line 1 plus Line 2)	$6,278,192
4. Match liability for current Federal fiscal year	$127,510
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	$6,150,682

Table 5 – Fiscal Year Summary - HOME Match Report

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Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Non-Federal Cash	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated Labor	Bond Financing	Total Match
1504-7	10/5/2016	$110					**11,603**	$11,713
1504-9	10/7/2016	$110					**16,876**	$16,986
1504-12	10/17/2016	$110					**13,304**	$13,414
1504-13	10/17/2016	$110					**3,911**	$4,021
1504-11	10/21/2016	$110					**3,227**	$3,337
1504-16	10/21/2016	$110					**4,619**	$4,729
1504-15	10/26/2016	$110					**9,908**	$10,018
1504-14	11/1/2016	$110					**17,349**	$17,459
1504-17	11/22/2016	$110					**14,460**	$14,570
1504-18	11/28/2016	$110					**16,744**	$16,854
1504-19	12/20/2016	$110						$110
1504-20	1/17/2017	$110						$110
1504-21	1/25/2017	$110					**10,944**	$11,054
1504-22	3/31/2017	$110					**800**	$910
1504-24	3/31/2017	$110					**14,623**	$14,733
1504-23	4/7/2017	$110					**16,245**	$16,355
1504-25	4/10/2017	$110					**6,442**	$6,552
1504-27	4/27/2017	$110						$110
1504-26	5/15/2017	$110					**3,670**	$3,780
1504-28	6/21/2017	$110					**8,589**	$8,699
1504-30	7/10/2017	$110					**8,120**	$8,230
1504-29	7/13/2017	$110					**6,285**	$6,395
1504-31	7/28/2017	$110					**7,906**	$8,016
1504-32	8/1/2017	$110					**14,720**	$14,830
CC-1	5/19/2017	$110					**2,904**	$3,014
CC-2	6/16/2017	$110					**10,200**	$10,310
CC-3	6/23/2017	$110					**3,832**	$3,942
1510	10/7/2016	$110					**10,815**	$10,925
1513	10/31/2016	$110						$110
1515	11/11/2016	$110					**10,246**	$10,356
1514	11/22/2016	$110					**11,603**	$11,713
1516	11/22/2016	$110					**5,881**	$5,991
1522	12/15/2016	$110					**8,776**	$8,886
1518	12/19/2016	$110					**16,010**	$16,120
1520	12/22/2016	$110					**80,797**	$80,907
1517	12/23/2016	$110						$110
1519	12/29/2016	$110						$110
1523	1/9/2017	$110					**11,294**	$11,404
1532	2/1/2017	$110					**14,367**	$14,477
1526	3/10/2017	$110					**11,531**	$11,641
1525	3/17/2017	$110						$110
1524	3/24/2017	$110						$110
1528	4/17/2017	$110						$110
1527	4/24/2017	$110					**1,500**	$1,610
1529	5/1/2017	$110					**10,960**	$11,070
1530	5/15/2017	$110					**16,395**	$16,505
1531	5/15/2017	$110					**40,318**	$40,428
1534	5/22/2017	$110					**5,940**	$6,050

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Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	**Date of Contribution**	**Non-Federal Cash**	**Foregone Taxes, Fees, Charges**	**Appraised Land/Real Property**	**Required Infrastructure**	**Site Preparation, Construction Materials, Donated Labor**	**Bond Financing**	**Total Match**
1533	6/21/2017	$110					**17,407**	$17,517
1538	8/1/2017	$110					**11,056**	$11,166
1537	8/11/2017	$110					**3,708**	$3,818
1540	8/18/2017	$110						$110
1543	8/29/2017	$110					**4,114**	$4,224
1542	8/31/2017	$110					**12,658**	$12,768
1539	9/1/2017	$110					**18,216**	$18,326
1541	9/7/2017	$110					**17,407**	$17,517
1551	9/13/2017	$110					**11,269**	$11,379
1550	9/15/2017	$110					**12,799**	$12,909
1552	9/25/2017	$110						$110
1553	9/29/2017	$110					**6,126**	$6,236
1548-01	7/10/2017	$110					**8,120**	$8,230
1548-02	7/13/2017	$110					**6,285**	$6,395
1548-03	7/21/2017	$110					**4,963**	$5,073
1548-04	7/25/2017	$110					**1,640**	$1,750
1548-05	7/27/2017	$110					**3,608**	$3,718
1548-06	7/28/2017	$110					**8,021**	$8,131
1548-07	8/1/2017	$110					**14,720**	$14,830
1548-08	8/1/2017	$110						$110
1548-09	8/22/2017	$110						$110
1548-10	9/5/2017	$110					**9,172**	$9,282
1548-11	9/8/2017	$110					**3,911**	$4,021
CC-01	7/6/2017	$110					**4,660**	$4,770
CC-02	7/12/2017	$110					**3,973**	$4,083
CC-03	7/12/2017	$110					**13,787**	$13,897
CC-04	7/14/2017	$110					**12,802**	$12,912
CC-05	9/1/2017	$110					**12,751**	$12,861
CC-06	9/19/2017	$110					**1,724**	$1,834
							Total	**$717,083**

Table 6 – Match Contribution for the Federal Fiscal Year: October 1, 2016 through September 30, 2017

HOME Program Income *Enter the program amounts for the reporting period*				
Balance on hand at beginning of reporting period	**Amount received during reporting period**	**Total amount expended during reporting period**	**TBRA Amount**	**Balance on hand at end of reporting period**
$0	$27,990	$27,990	$0	$0

Table 7 – Program Income (Recaptured and Repaid Funds Not Included)

DRAFT

Minority Business Enterprises and Women Business Enterprises *Indicate the number and dollar value of contracts for HOME projects completed during the reporting period*						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts	0	0	0	0	0	0
Number	0	0	0	0	0	0
Dollar Amount	$0	0	0	0	0	$0
Subcontracts	0	0	0	0	0	0
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts	0	0	0			
Number	0	0	0			
Dollar Amount	$0	0	$0			
Subcontracts	0	0	0			
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 – Minority Business and Women Business Enterprises

Minority Owners of Rental Property *Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted*						
	Total	**Minority Business Enterprises**				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition *Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition*		
Parcels Acquired	0	0
Businesses Displaced	0	0
Nonprofit Organizations Displaced	0	0
Households Temporarily Relocated, not Displaced	0	0

Households Displaced	Total	**Minority Property Enterprises**				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

Minority and Women Business Enterprises: The City of Billings receives a small amount of HOME funding which is primarily utilized for down payment and closing cost assistance through the First Time Home Buyer program. As such, the opportunity to provide HOME-funded contracts is limited to affordable housing projects initiated and carried out by Community Housing Development Organizations (CHDOs). This fiscal year, the City entered into a CHDO development agreement with NeighborWorks Montana for the development of two new homeowner housing units.

Minority Owners of Rental Property: The City has not provided assistance to Minority Business Enterprises for the development of affordable rental housing this fiscal year. Therefore, information relative to Minority Owners of Rental Property is not currently available.

Relocation: City staff members work to minimize displacement of persons through the City's affordable housing, foreclosure and redevelopment activities. The Uniform Relocation Act provides important protections and assistance for people affected by the acquisition, rehabilitation, or demolition of real property for federal or federally-funded projects. The 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 City requires developers to make relocation benefits available to displaced persons during housing initiatives funded with federal dollars. Properties with resident tenants are not eligible for purchase through the City's First Time Home Buyer program. The City's Foreclosure Acquisition / Rehabilitation program focuses on the acquisition of vacant, foreclosed homes without the displacement of any residents.

This fiscal year, no persons were displaced through affordable housing acquisition, rehabilitation or development activities.

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CR-20 Affordable Housing *91.520(b)*

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

	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	0	0
Number of non-homeless households to be provided affordable housing units	26	74
Number of special-needs households to be provided affordable housing units	0	0
Total	**26**	**74**

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance	0	0
Number of households supported through the production of new units	0	0
Number of households supported through the rehab of existing units	5	4
Number of households supported through the acquisition of existing units	21	70
Total	**26**	**74**

Table 12 – Number of Households Supported

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

The City of Billings established housing unit goals specifically relating to the First Time Home Buyer, home repair and housing development programs. The City exceeded the one-year affordable housing goals in home buyer programs and made acceptable progress in meeting the five-year home repair goals established in the Consolidated Plan.

The goal established for the development of affordable housing units was set at two units for this fiscal year. The City's Affordable Housing Development Program supports the development of both rental and homeownership housing and the City has set a five-year goal to produce or rehabilitate at least four housing units. City staff facilitated the execution of a CHDO development agreement with NeighborWorks Montana to develop two homeownership housing units, which were completed this fiscal year.

The 74 units represented in the non-homeless households provided with affordable housing includes:

- Four Housing Rehabilitation program households, #1546.
- One Foreclosure program household #1503 (Terry Avenue).
- 69 First Time Home Buyer households, including: 29 CDBG beneficiaries, #1548; 30 HOME beneficiaries, #1538 through #1572; and ten additional households served with non-federal funds.

The PR-03 CDBG Activity Summary Report in HUD's IDIS system indicates the following:

- Six Housing Rehabilitation program households closed in FY2015-2016 (#1476) and two more homes closed in FY2017-2018 (#1502). In FY2017-2018, a total of four

households were assisted (#1546).

- In the Foreclosure Acquisition / Rehabilitation program:
  - Activity 1503:
    - The Chamberlain property was purchased in April 2015, rehabilitated and then sold to a low income household in November 2016. This is a FY16-17 accomplishment.
    - The Terry Avenue property was purchased in March 2017, rehabilitated, and then sold to a low income household in March 2018. This is a FY17-18 accomplishment.
  - Activity 1547 includes pending accomplishments for FY18-19:
    - The Plainview home was acquired by the City in September 2018 and rehabilitation is nearly finished. When complete, it will be sold to a low income household.
    - The 19th Street home was acquired by the City in February 2018 and rehabilitation is currently underway. When complete, it will be sold to a low income household.
- 28 households were assisted through the CDBG First Time Home Buyer program in FY2016-2017 (#1504) and 29 households were assisted in FY2017-2018 (#1548).
- 234 beneficiaries were served through the Billings Metro VISTA Project in FY2016-2017 (#1505) and an additional 508 beneficiaries were served in FY2017-2018 (#1549).

Homeless and Rental Assistance Goals: Goals relative to the provision of affordable housing units for the homeless and rental assistance were set at zero this fiscal year. Federal affordable housing investments supported home buyer / repair programs, which are primarily designed to assist low income households to achieve and maintain homeownership. The City's Consolidated Plan identifies the many housing options available to those experiencing homelessness, some of which the City funded through alternative means.

Discuss how these outcomes will impact future annual action plans.

The City of Billings is utilizing CDBG and HOME funds to support home buyer, repair, and development programs. Outcomes are based on program demand and available federal and non-federal funding resources to carry out planned activities. City staff will continue to set achievable annual action plan goals and will adjust the Consolidated Plan as needed to reflect changes in available federal and non-federal funding and program demand.

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

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low income	2	4
Low income	32	26
Moderate income	0	0
Total	**34**	**30**

Table 13 – Number of Persons Served (Affordable Housing)

Narrative Information

All of the City's beneficiaries served this fiscal year had household incomes less than 80 percent of the Area Median Income (AMI) level. In the CDBG program, *low and moderate income* refers to households under 80 percent of the AMI, which is the same threshold in determining factor in the HOME program's *low income* determination. All of the City's affordable housing beneficiaries were homeowners or were assisted in achieving homeownership. Therefore, the City did not offer rental assistance during this fiscal year.

CDBG actual data illustrated in Table 13 includes homebuyer and home repair programs combined. The HOME actual category includes homebuyer and housing development activities. Actions taken to foster and maintain affordable housing include the following:

- **CDBG First Time Home Buyer:** A total of 29 homeowner households were assisted. All of the households were low and moderate income (less than 80% AMI). There were no extremely low income households served in this program.
- **HOME First Time Home Buyer:** A total of 30 homeowner households were assisted. Four were extremely low income and 26 were low income.
- **Home Repair / Foreclosure Programs:** Five total households were assisted through the City's home repair and foreclosure programs. Two were extremely low income and three were low income (less than 80% AMI).
- **Affordable Housing Development:** The City finalized an agreement with NeighborWorks Montana to develop two new homeownership housing units. Construction has begun on Riverfront Point II and the units will be sold to low income households (less than 80% AMI).

The City of Billings met or exceeded most of the one-year goals for affordable housing programs and did not provide assistance to middle-income households. None of the beneficiaries receiving housing assistance reported they were experiencing homelessness or involuntarily displaced. The City fell short of meeting its goal to rehabilitate five housing units through home repair programs, but greatly exceeded the goal to provide assistance to acquire existing units.

Efforts to address *worst case needs* refers to low income renter households who pay more than half of their income for rent, live in seriously substandard housing, including the homeless, or who have been involuntarily displaced. This fiscal year, the City did not create any goals to assist rental households with rental assistance. However, the City may have assisted rental households in acquiring a home through the homebuyer programs.

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The needs of the disabled are, in part, addressed through the City's home repair programs via improvements aimed at increasing accessibility. This fiscal year, three households assisted through Community Development Division's housing programs self-reported that they were disabled.

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CR-25 Homeless & Other Special Needs Affordable Housing *91.220(d, e); 91.320(d, e); 91.520(c)*

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

The City does not directly receive Continuum of Care, Emergency Shelter Grant, or other federal funds to exclusively support efforts to impact homelessness. CDBG resources have decreased dramatically, which greatly inhibits the City's ability to support overall administrative activities to coordinate services to benefit the homeless, particularly when the City does not directly receive mainstream federal funding sources to impact homelessness. Therefore, the City's progress in reaching out to homeless persons, particularly unsheltered persons, is greatly limited.

In 2006, City staff began the process of writing a ten-year plan to impact homelessness. Local housing, health, and social service organizations have been intricately involved in planning processes for the homeless and chronically homeless. The Billings City Council created the Mayor's Committee on Homelessness, which is comprised of twenty individuals representing nonprofit organizations, lending, housing, philanthropy, social service providers, code and law enforcement, economic development, work force agencies, veterans, civic and business leaders, philanthropic organizations, academia, health care, American Indian stakeholders, and those experiencing homelessness. In 2009, the City's ten-year plan to impact homelessness, ***Welcome Home Billings***, was adopted by the Billings City Council.

To the greatest extent possible, City staff has continued to implement Welcome Home Billings with support provided through the Billings Metro VISTA Project. VISTA members have been placed at 50 nonprofit Host Site organizations to work on specific anti-poverty initiatives to assist people in accessing housing, healthcare, education and employment.

The Community Development Division staff has implemented the following:

- Development and distribution of the City's ***Resource Map*** and ***Notepad***, which includes a comprehensive downtown service directory for anyone seeking assistance. Members of the Mayor's Committee on Homelessness and local nonprofit organizations have committed to updating this resource after the print versions have been fully distributed. These resources are also available at the City office and are also online:
    - www.CityofBillings.net/resourcemap
    - www.CityofBillings.net/notepad
- Placement of full-year and ten-week summer associate VISTA members at local nonprofit organizations primarily serving the homeless and those at risk of homelessness through the ***Billings Metro VISTA Project***.
- Provide support to further the ***Community Innovation Summit***, which is now engaging those living on the streets in service provision and treatment.

The Mental Health Center manages the Projects for Assistance in Transition from Homelessness (PATH) outreach program to engage those living outside or in areas unfit for human habitation. Tumbleweed runs a Street Outreach program to seek out unaccompanied youth to engage them in services. A complete listing of services, including outreach, is included in the MA-30 Homeless Facilities and Services section of this Consolidated Plan.

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Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through addressing the emergency shelter and transitional housing needs of homeless persons.

The City of Billings is addressing homelessness to the greatest extent possible, although the City does not directly receive Emergency Solutions Grants, McKinney Vento Homeless Assistance Act grants, or other federal funding to specifically address the housing needs of the homeless. Temporary housing needs for the homeless in Billings are primarily met by the Montana Rescue Mission (MRM) Women's & Children's Shelter, MRM's Men's Shelter, the Community Crisis Center, YWCA's Gateway House, Volunteers of America's Independence Hall, Family Promise of Yellowstone Valley, and Rimrock. A complete listing of services, including emergency and transitional housing, is included in the MA-30 Homeless Facilities and Services section of the Consolidated Plan.

MRM does not seek nor utilize federal funds for its operation. Several local service providers assist homeless families by providing funding for rent, mortgage, utility, and deposit assistance. The Community Crisis Center provides crisis intervention and 23-hour stays as a technique to impact chronic homelessness. The YWCA provides transitional housing for victims of domestic violence.

Volunteers of America's Independence Hall is a 20-bed men's facility that has been providing transitional housing and services for honorably discharged veterans since 2009. While residing at Independence Hall, veterans are able to continue receiving treatment through the Department of Veterans Affairs and are given opportunities to participate in activities designed to help them reconnect with the community and get back to independent living. Independence Hall has served approximately 400 veterans since it opened in 2009.

City staff has provided over $800,000 in HUD Economic Development Initiative and State financing to establish new housing for those experiencing homelessness in Billings:

- In October 2008, the City of Billings released a Request for Proposals to develop new housing to serve those experiencing homelessness utilizing a housing first philosophy of management. A total of $500,000 was awarded to Family Promise of Yellowstone Valley, formerly known as Interfaith Hospitality Network. Two duplex apartment properties were acquired and rehabilitated, resulting in a total of four rental units serving homeless families. Thirty-two families, equaling 97 individuals, have been assisted through this project to date.
- In August 2010, the City of Billings released another Request for Proposals to develop a combined housing and employment project for occupancy by individuals and / or families experiencing homelessness. This type of social enterprise is considered a national best practice. A total of $300,000 was awarded to Rimrock, formerly Rimrock Foundation, to acquire and rehabilitate a single-family home to house up to six men who have experienced chronic homelessness. Twenty-five individuals have been supported through this social enterprise business and housing program.

For those living on the downtown streets of Billings, a new position has been created for an addiction / mental health counselor to accompany two downtown police officers when engaging people living on the streets. This initiative has been undertaken as one of the many outcomes from the Community Innovations Summit, which was facilitated by the Community Development Division, City Administration, and the Downtown Billings Alliance. A recent article published by the Billings Gazette highlights immediate successes as a result of this program. A complete list of service providers offering housing, services and prevention support is located in MA-30 Homeless Facilities and Services section of the Consolidated Plan.

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Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through helping low income individuals and families avoid becoming homeless, especially extremely low income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The City does not receive or administer McKinney Vento Homeless Assistance Act or Emergency Solutions Grant funds to support programs to directly meet the needs of the homeless. The City did not receive requests this fiscal year for CDBG or HOME funding to assist the homeless.

The Montana Continuum of Care (MT CoC) for the Homeless Coalition is the state's lead agency for addressing homeless activities through federal CoC funds, which includes the City of Billings. The MT CoC is a statewide collaboration of diverse homeless service providers, nonprofit organizations, local and state governments dedicated to preventing homelessness. The avoidance of discharging people living in federally funded programs to homelessness is a primary philosophy for Montana service providers.

CoC awards to organizations located in the City of Billings have historically been very low, as renewal grants are prioritized over pro-rata need and geographic distribution. Organizations in Billings have previously received five to seven percent of the over $2.5 million awarded to the statewide Continuum of Care each year.

- The Housing Authority's Shelter Plus Care program provides housing assistance payments to individuals or families who are homeless and disabled, primarily with serious mental illness, addiction, or other conditions. Case management is provided by the South Central Montana Regional Mental Health Center. Over the past decade, the Housing Authority of Billings has provided housing to an estimated 1,650 households who were experiencing homelessness.
- District 7 HRDC receives Emergency Solutions Grant funding which is utilized for homeless prevention activities and rapid-rehousing exclusively. HRDC staff reports they do not maintain a waiting list due to the volume of households in need. HRDC also received HUD CoC funds for rapid-rehousing homeless families living in shelters.

Additional local organizations providing prevention services include Family Service, Inc., the Food Bank, the Center for Children and Families, Harmony House, the Yellowstone AIDS Project, St. Vincent de Paul, and Tumbleweed, to name a few.

To the greatest extent possible, City staff has continued to implement *Welcome Home Billings*, the City's ten-year plan to impact homelessness. The City assists in the prevention of homelessness through the development and distribution of the City's ***Resource Map*** and ***Notepad***, which includes a comprehensive downtown service directory for anyone seeking assistance. These resources have been distributed to health / mental health care facilities, foster care and other youth facilities, and local corrections programs.

Through the Billings Metro VISTA Project, over 1,000 beneficiaries have received direct services relating to housing, food security, economic opportunity, education and employment support. Full-year and summer associate VISTA members have supported 50 nonprofit organizations in the Billings area from 2007 to the present. For other accomplishments, please see the response to the first question in this section (CR-25).

DRAFT

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

As previously stated, the City of Billings does not receive mainstream federal funding to reduce and end homelessness. To the greatest extent possible, City staff has continued to implement Welcome Home Billings, the City's ten-year plan to impact homelessness.

The City's ***Resource Map*** and ***Notepad*** includes a comprehensive downtown service directory for anyone seeking assistance. These resources have been distributed to health / mental health care facilities, foster care and other youth facilities, and local corrections programs.

The City sponsored a full-year VISTA member to assist NeighborWorks Montana in researching the feasibility of establishing a comprehensive housing center to serve low income renters and homeowners. The VISTA member facilitated a working group comprised of the Billings affordable housing organizations to bring the Home Center into fruition. Participants included the City of Billings, the Housing Authority of Billings, Rebuilding Together Yellowstone County, District 7 HRDC, Rural Dynamics, Beartooth Resource Conservation and Development, and Homeword.

After 18 months of planning, the Home Center opened in July 2015 and it is located in downtown Billings, which is central to the City's low income neighborhoods. The City provided a second, full-year VISTA member from July 2015 to July 2016 to help create the Home Center's housing programs. Today, the Home Center provides comprehensive housing services including information on available units, fair housing information, housing education and counseling. Housing services are coordinated under one roof, creating the opportunity for potential homebuyers and renters seeking safe, affordable homes and access all housing services in a one-stop-shop.

Additional information regarding crosscutting strategic and programmatic goals to impact homelessness is located in SP-40 Institutional Delivery Structure of the Consolidated Plan. For other accomplishments, please see the response to the first question in this section (CR-25).

DRAFT

CR-30 Public Housing *91.220(h), 91.320(j)*

Actions taken to address the needs of public housing.

The Housing Authority of Billings is eligible to apply for funding through the City's Affordable Housing Development Program. In the past, the City has granted funds to support the Housing Authority's efforts to expand affordable housing opportunities. The City has also provided funding for a variety of rehabilitation and new construction projects to neighborhoods that have public housing units.

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 Housing Authority complexes have been built. The City has also provided funding for parks and play areas for the neighborhoods where Housing Authority families reside. The City's First Time Home Buyer program assists with home ownership down payment assistance and home ownership counseling for clients interested in purchasing their first home.

City staff coordinates with the Housing Authority of Billings to facilitate environmental reviews, housing quality inspections, housing needs assessments, and assists with applications for supportive services when required. The City has also dedicated VISTA resources to support food security initiatives and a new reading literacy program. Several community gardens have been created on residential properties owned and managed by the Housing Authority.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership.

The Housing Authority implements the Family Self-Sufficiency program, which links participants to community agencies to help them become self-sufficient through individualized goal setting. Fifty-one families participated in the program. The Housing Authority expanded the program to include clients from the Montana Department of Commerce (MDOC). Four Housing Authority families became homeowners and two MDOC families became homeowners with Housing Choice Voucher assistance. Forty-nine households have achieved homeownership through this program to date. Resident councils, an Advisory Board and the Family Self-Sufficiency Panel are involved in providing input on program needs and assisting others to become actively involved in the process. Additional information is included in the five-year plan on file at the Housing Authority office.

Each year, the Housing Authority goes through a process to assess physical needs addressed by tenants through their Resident Advisory Board for the Annual Plan process; comments are also solicited via Resident Council functions throughout the year. These comments, Board participation, tenant commissioners, and Public Housing Administration's daily communications with the Housing Authority's client base serve to assist in assessing client needs for physical adjustments, security issues, and needed links with the community. The physical needs requests are implemented along with staff recommendations in the Capital Fund planning process.

Actions taken to provide assistance to troubled PHAs.

Not applicable. The Housing Authority is a High Performer for the Public Housing Assessment System and, therefore, a review of troubled status needs is not required as part of the Consolidated or Annual Action Plan.

DRAFT

CR-35 Other Actions *91.220(j), 91.320(i-j)*

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. *91.220 (j); 91.320 (i)*

According to the City's most recent Analysis of Impediments to Fair Housing Choice, most of the typical exclusionary provisions that would hinder affordable housing development do not exist in the current Billings zoning codes. However, the following issues may act as barriers to affordable housing investment:

- Density bonuses have not been established to offset the cost of development if a project contains a certain percentage of affordable housing.
- There is currently not a way to fast-track the approval processes for affordable housing development projects.

  However, fast-tracking may not be as important in Billings as it is in other parts of the country. Subdivision review times are set by the Montana State Legislature. Building permit reviews for single-family homes (one to four units) are three to five days and commercial permits, including multi-family with five or more units in a structure, take four to six weeks to review. Other areas of the country, and some cities in Montana, take 30 days or longer for single-family reviews and four to six months for commercial reviews.
- The City does not currently permit a waiver or reduction of impact fees, including water and wastewater system development fees, to promote affordable housing development.
- The use of accessory dwelling units is not a widely practiced housing development strategy.

Other public policy concerns relate to inadequate funding to further affordable housing development. Dwindling federal resources greatly inhibits the City's ability to generate new affordable housing.

City staff has recently updated the Growth Policy, which highlights the need for affordable housing development. While this document is essentially a planning guide, staff are hopeful that policy leaders will take into account the essential nature of potential barriers to affordable housing investment when making policy determinations.

Actions taken to address obstacles to meeting underserved needs. *91.220(k); 91.320(j)*

The City has been meeting underserved needs through the following programs:

- **Affordable Housing Preservation:** Housing Rehabilitation, Manufactured Home Repair, Affordable Housing Development, and Foreclosure Acquisition / Rehabilitation.
- **New Affordable Housing Opportunities:** Community Housing Development Organizations, Affordable Housing Development, and First Time Home Buyer.
- **Housing Choice:** Fair housing education in all City programs and supporting the development of the Billings Home Center.
- **Poverty Impact:** Billings Metro VISTA Project.

Please Note: The priority need identified to expand housing choice is supported by administrative activities and has not been allocated separately from the above.

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Actions taken to reduce lead-based paint hazards. *91.220(k); 91.320(j)*

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, there are over 29,317 housing units built before 1979 that are at risk of containing lead-based paint, which comprises 64 percent 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 five 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 three percent of the children had levels ≥ five ug/dL. One in four of the children tested had ≥ one ug/dL. This information is the latest data available on children in Montana and exposure to lead to date.

The City will continue to practice 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 lead-based paint requirements. Education on the hazards of exposure to lead-based paint is provided for each rehabilitation project. The City currently offers risk assessment, paint inspections, and clearance testing through certified professionals. The City also has access to certified, lead-safe and abatement contractors to ensure compliance.

In addition, City staff 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.

In summary, the City of Billings has achieved full compliance with HUD lead-based paint requirements. City staff continues to develop local contractor capacity for regulatory compliance. Certified Risk Assessors are utilized for assessments and clearance activities. All rehabilitation projects facilitated and monitored by City staff are brought to lead-safe standards.

Actions taken to reduce the number of poverty-level families. *91.220(k); 91.320(j)*

The City supports efforts to improve economic conditions and supports activities to address economic conditions of low income households in Billings. All of the Consolidated Plan strategies target the improvement of economic conditions of lower income households in the community, including housing development, financing home repair and buyer activities, continuing partnerships to support community needs and funding public service activities. Specifically, the City's efforts to reduce the number of persons living below the poverty level include CDBG and HOME funding allocations to home buyer / repair programs. The results of this fiscal year's actions are as follows:

- **First Time Home Buyer:** Four extremely low income households and 65 low income households acquired their first home.
- **Home Repair:** One extremely low income and three low income households received assistance to make needed repairs to their homes.
- **Foreclosure Acquisition / Rehabilitation:** One extremely low income household was able to purchase a fully-renovated home.

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The City has continued to work with nonprofit organizations to help address the human service needs of lower income residents of the community in general and also to serve lower income neighborhoods. This has been achieved in the past through funding allocations to social service organizations under CDBG Public Service activities, including the VISTA program. In addition, HOME program requirements stipulate serving low income households exclusively.

The City of Billings - Community Development Division staff began working with the AmeriCorps VISTA program in 2007 to assist with the development and implementation of Welcome Home Billings, the City's ten-year plan to impact homelessness. This project generates full-time volunteers to work in nonprofit organizations to support homeless and poverty-impact initiatives.

By July 2009, the City had earned an official project designation and the Billings Metro VISTA Project was established. This initiative is particularly important when funding levels decline; all work completed must impact poverty and homelessness. Volunteers work to provide social services to those experiencing homelessness and / or poverty. Examples of projects undertaken this fiscal year include: furthering childhood literacy and food security for public housing residents at the Housing Authority of Billings; assisting the Parks and Recreation Department expand food security for low income households through the development of a community garden located in Billings' Southwest Corridor neighborhood; assisting economically disadvantaged children succeed in education through monitored mentoring programs; and expanding health education for American Indians in Billings.

Actions taken to develop institutional structure. *91.220(k); 91.320(j)*

The City of Billings is the lead government entity responsible for Consolidated Plan activities funded through CDBG and HOME. The City's ability to carry out home repair / buyer and poverty impact programs relies heavily on partnerships in the community, representing a significant strength in institutional structure. Gaps in institutional structure would, in part, be remedied with additional administrative funds to further coordinate services. The City has been carrying out housing, homeless and other community development activities to address the following priorities as listed below.

Affordable Housing Preservation: The City has the comprehensive ability to address priority needs through home repair programs such as Housing Rehabilitation, Manufactured Home Repair, and Foreclosure Acquisition / Rehabilitation programs. Private-industry contractors are trained in lead-safe work methods and staff advertises contractor opportunities through print media, on the City's website, through the Neighborhood Task Forces and by holding public informational meetings. Emphasis on the provision of opportunity to Section 3, minority and women-owned businesses ensures furthering equal opportunity to low income owners / employers, racial / ethnic minorities and businesses owned by women.

New Affordable Housing Opportunity: The City maintains positive relations with the Housing Authority of Billings, CDBG and HOME officials at the Montana Department of Commerce, private industry developers, lenders, realtors and others to ensure collaboration and engagement in the implementation of First Time Home Buyer and Affordable Housing Development programs. The City has two currently certified nonprofit CHDOs and is actively seeking additional project opportunities for the purposes of affordable housing development.

Housing Choice: City staff maintain positive and close relationships with the staff at Montana Fair Housing; the primary nonprofit agency in fair housing education and enforcement for the state. Staff actively supports efforts to hire additional fair housing testers, particularly minorities, through targeted recruitment efforts. In addition, local housing organizations made it possible to open the Home Center; a one-stop shop for housing needs. One of the goals of the Home Center is to address the beginnings of segregated neighborhoods and lending discrimination for Hispanic Americans in Billings, as identified in

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the City's Analysis of Impediments to Fair Housing Choice. Staff also attends a South Park annual event in September to promote home buyer / repair programs as well as contractor opportunity.

Poverty Impact: CDBG and HOME resources are not adequate to meet the needs of the homeless and those experiencing poverty in Billings. The City's main anti-poverty initiative is the implementation of the Billings Metro VISTA Project. The City has provided full-year and summer associate VISTA support to dozens of nonprofit organizations in the Billings area to date. The continuance of this initiative is imperative to strengthen service delivery to those in need. The Billings Metro VISTA Project enables the City to support nonprofit organizations in a sustainable fashion since the provision of public service grants is no longer an option due to historically low CDBG allocations.

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

The City of Billings works in collaborative partnership with social service providers, other government agencies, and the private sector to further all community development programs, including the Housing Authority of Billings and the CDBG and HOME administrators at the Montana Department of Commerce.

City staff believes positive collaboration and coordination of programs and services will enhance the community's ability to meet the needs of low income citizens. Additional information on collaboration with social service agencies, public, and private housing organizations is noted in the response to the previous question regarding institutional structure. The City has continued coordinating with public, private, and social service agencies to further activities and projects identified herein, including participation in the following groups and initiatives:

- **Neighborhood Task Forces:** City staff attends Neighborhood Task Force meetings each spring in order to garner feedback relative to available programs, accomplishments, and proposed use of federal funds for future programs. The Neighborhood Task Forces represent areas in Billings with high residency concentrations of minority, low income, and female-headed households.
- **Adjacent Neighborhood Committee:** The Planning and Community Services Department facilitates a quarterly meeting for the Neighborhood Task Force officers to collaborate. The City Council has dedicated $12,000 in non-federal funds to support Task Force newsletters, public information mailings, and community events.
- **Community Innovations Initiatives:** In October 2014, staff members from the Community Development Division, City Administration, and the Downtown Billings Alliance facilitated the Community Innovations Summit. The Summit was the catalyst for a multi-jurisdictional, coordinated response to downtown street homelessness. City staff and community leaders addressed legislation, the justice system, law enforcement and business environments. A recent article, published by the Billings Gazette, highlights immediate successes as a result of this collaboration.
- **Resource Map and Notepad:** City staff has continued to distribute the City's ***Resource Map*** and ***Notepad***, which includes a comprehensive downtown service directory
- **Billings Metro VISTA Project:** The City has assisted dozens of nonprofit social service organizations to expand and enhance programs for the homeless and those experiencing poverty. Priority focus areas include housing, financial literacy, employment, education, food security and access to healthcare.

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

The City maintains records reflecting the Analysis of Impediments to Fair Housing Choice and actions taken to overcome the effects of the impediments identified in the Analysis of Impediments. A summary of the actions taken follow in the narrative, map and chart below.

The City's Analysis of Impediments to Fair Housing Choice, cited in the Consolidated Plan's Needs Assessment, revealed the beginnings of segregated neighborhoods and lending discrimination for Hispanic Americans in Billings. The Analysis contained the following recommendation:

> *Billings should establish a housing service center… where home seekers are introduced to housing options beyond the racial or ethnic neighborhoods to which they often feel they are limited.*

The City sponsored a full-year VISTA member to assist NeighborWorks Montana in researching the feasibility of establishing a comprehensive housing center to serve low income renters and homeowners. The VISTA member facilitated a working group comprised of the Billings affordable housing organizations to bring the Home Center into fruition. Participants included the City of Billings, the Housing Authority of Billings, Rebuilding Together Yellowstone County, District 7 HRDC, Rural Dynamics, Beartooth Resource Conservation and Development, and Homeword.

After 18 months of planning, the Home Center opened in July 2015 and it is located in downtown Billings, which is central to the City's low income neighborhoods. The City provided a second, full-year VISTA member from July 2015 to July 2016 to help create the Home Center's housing programs. Today, the Home Center provides comprehensive housing services including information on available units, fair housing information, housing education and counseling. Housing services are coordinated under one roof, creating the opportunity for potential homebuyers and renters seeking safe, affordable homes and access all housing services in a one-stop-shop.

The City has focused 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 (IDIS) 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 has dedicated zero percent of funding to target areas in favor of supporting a citywide approach to further fair housing, equal opportunity and anti-segregation efforts.

The following map clearly illustrates the disbursement of federal investments to promote equal opportunity in all neighborhoods for the City's home buyer, repair and foreclosure programs for this fiscal year. *Please note, no indirect benefits activities (sidewalk repairs, infrastructure) were undertaken this fiscal year.*

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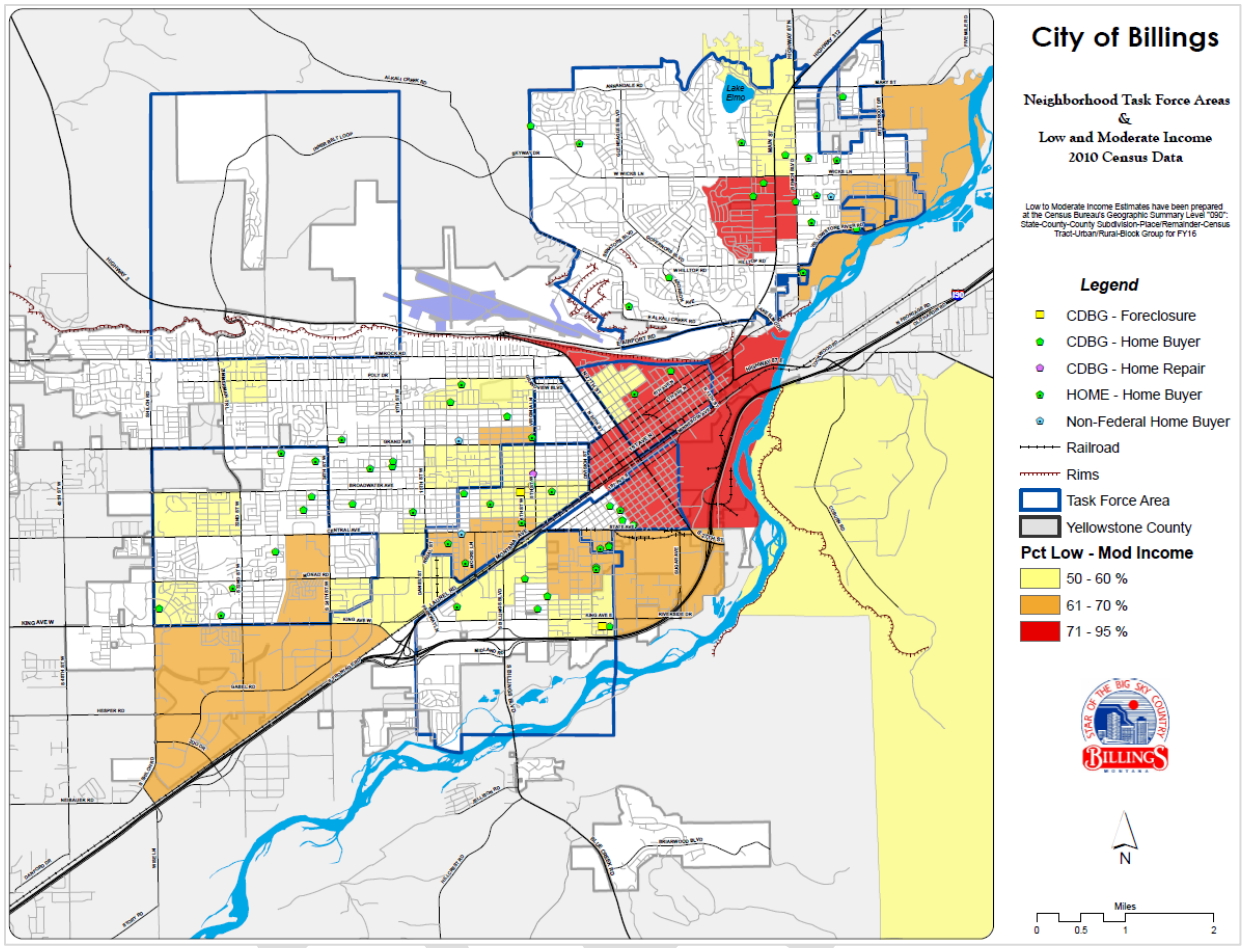
City of Billings
Neighborhood Task Force Areas
&
Low and Moderate Income
2010 Census Data
Low to Moderate Income Estimates have been prepared at the Census Bureau's Geographic Summary Level "150": State-County-County Subdivision-Place/Remainder-Census Tract-Urban/Rural-Block Group for FY16
Legend
CDBG - Foreclosure
CDBG - Home Buyer
CDBG - Home Repair
HOME - Home Buyer
Non-Federal Home Buyer
Railroad
Rims
Task Force Area
Yellowstone County
Pct Low - Mod Income
50 - 60 %
61 - 70 %
71 - 95 %
N
Miles
0
0.5
1
2

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Analysis of Impediments to Fair Housing Choice (AI) Matrix

The following chart illustrates City staff's documentation and record-keeping on selected impediments identified in the latest AI, including identified impediments and actions taken during the fiscal year. Small staff size, limited funding and constrained sphere of influence greatly reduce City staff's ability to address each of the eleven impediments identified in the AI.

**References Original AI Numbers for Impediments and Recommendations.*

Selected Impediments	*Actions Taken*
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 market for non-Hispanics, Whites and Asians and another for all other minorities (AI 1*).	**A1:** Produced and disseminated consumer education on Fair Housing issues to make people aware that they can move anywhere in the area they can afford. This effort is supported through the Billings Home Center.
	A2: Worked to expand housing choices for existing and potential new residents beyond neighborhoods identified by their own race or ethnicity by supporting the activities of the Billings Home Center, including rental and homeowner education. Presentations for housing programs are made each February at Neighborhood Task Force meetings, where high minority and low income households are concentrated. City staff also provided on-site workshops, distributed various publications and conducted an extensive outreach and advertising campaign throughout the year to increase access and equal opportunity for minorities, the disabled, the elderly, and single-headed households. Please refer to *CR-05 Goals and Outcomes, CR-10 Racial and Ethnic Composition of Families Assisted,* and *CR-15 Resources and Investments* for details on outcomes of these actions taken to address this impediment.
B. Discriminatory real estate industry practices such as racial and ethnic steering distort the free market in housing (AI 2*).	**B1:** Continued to partner with enforcement agencies providing testing of the real estate industry practitioners to identify discriminatory practices in rental and for-sale housing. This fiscal year, City staff also assisted in recruiting new fair housing testers, particularly minorities, for Montana Fair Housing.
C. Discrimination against Latinos in issuing government-backed mortgage and refinancing loans continues unabated in Billings as it does throughout the nation (AI 3*).	**C1:** Continued to support the efforts of local housing counseling agencies, especially to Latinos, before they apply for a mortgage. This fiscal year, all of the City's First Time Home Buyer participants attended pre-acquisition counseling through the Billings Home Center's homebuyer education class. This fiscal year, nearly 400 people attended homebuyer education classes. City staff attends a community park event each September in the Billings South Side neighborhood to promote home ownership, home repair, and fair housing assistance. Staff will also utilize this opportunity to recruit Section 3 contractors. This neighborhood has a high concentration of Hispanic and other minority households. City staff also provided on-site workshops, distributed various publications and conducted an extensive outreach and advertising campaign throughout the year to increase access and equal opportunity for minorities, the disabled, the elderly, and single-headed households. Please refer to *CR-05 Goals and Outcomes, CR-10 Racial and Ethnic Composition of Families Assisted,* and *CR-15 Resources and Investments* for details on outcomes of these actions taken to address this impediment.

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	C2: Continued to provide brochures containing information apprising potential homebuyers of the availability of housing counseling and how to spot / report discriminatory lending practices. This effort is supported through the Community Development office, on the City's website, and the Billings Home Center. City staff has also updated its website to include information on nondiscrimination, accommodations and the City's grievance procedure. Please refer to www.CityofBillings.net/ComDev for details (sent direct link to FHEO on August 23, 2017).
D. The relatively high cost of housing continues to pose a barrier to fair housing choice in Billings (AI 4*).	**D1:** Continued to work toward the provision of affordable housing through Community Development programs including home buyer, home repair, housing development and poverty-impact programs. Please refer to *CR-05 Goals and Outcomes, CR-10 Racial and Ethnic Composition of Families Assisted,* and *CR-15 Resources and Investments* for details on outcomes of these actions taken to address this impediment. The City's Affordable Housing Development program includes the opportunity to provide federal and local funds to facilitate the conversion of rental properties to limited equity cooperatives (4C*), as recommended in the City's AI. Although funds were available this fiscal year, the City did not receive any proposals for this type of housing development.
E. Review Unified Zoning Regulations and review requirements to foster compliance with fair housing law and to promote inclusionary zoning (AI 4 through 10*).	**E1:** The City's Planning Division is also preparing to review all of the City's zoning codes relative to continuity and to promote inclusionary zoning. The project began in late 2017 and continue through 2019. The Community Development Division staff is currently working with Planning Division staff to recruit an AmeriCorps VISTA volunteer to assist in the zoning review. The overall goal of the VISTA project is to reduce concentrated poverty while improving access to: quality education; affordable housing; employment opportunities; and healthcare through the development and implementation of a statewide plan to overcome barriers to housing choice and promote inclusivity. This will require data analysis to aid in the identification of: racially concentrated areas of poverty; factors contributing to segregation; housing access disparities; and disproportionate housing needs. The capacity built through this project will result in improved access to quality housing, education, healthcare and employment opportunities to ensure long-term success. Continued to provide staff support to the Planning Division in reviewing: - Minimum percentage of affordable housing units per development with five or more units (AI 4A*). - Housing Authority of Billings first right of refusal for inclusionary units (AI 4B*). - Amendments for neighborhood plans to promote stable, socio-economically diverse neighborhoods throughout Billings (AI 5*). - Affirmative marketing and billboard advertising requirements (AI 6A and 6B*). - Developer brochure distribution requirements (AI 6C*). - Fair Housing logo / language requirements for agreements (AI 6D*). - Occupancy requirements and equal treatment for group living for the disabled (AI 7 and 8*). - Accessory dwelling units / cottage cluster homes (AI 9 and 10*). **Staff Note:** AI 6E* recommended building requirements should only be issued if the Americans with Disabilities Act accessibility requirements are met. The City of Billings Building Division has been compliant for many years.

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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 (AI 11*).	**F1:** Continued to offer support for efforts to promote economic diversity in all schools to ensure every school has a majority of pupils coming from middle-class / higher-income households. In previous fiscal years, the City placed AmeriCorps VISTA members in the Planning Division to work with the school district to improve access to schools via alternative modes of transportation.
	F2: Continued to offer support for the Housing Authority's efforts to expand the geographic range where holders of Housing Choice Vouchers look for housing.

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CR-40 Monitoring *91.220, 91.230)*

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

Overall monitoring includes the following for CDBG and HOME programs:

- 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, and demand for, the Community Development Division's programs.
- 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.

Organizations: The City may fund a variety of organizations to carry out CDBG and HOME activities each year. Written agreements are executed that describe applicable regulations, the scope of work and funding. This fiscal year, the City entered into an agreement with NeighborWorks Montana to develop two homeownership housing units. Organizations receiving City funds are monitored by Community Development staff to ensure compliance with the terms of the agreement and applicable regulations, including Section 3 and minority business outreach.

Affordable Housing Projects: Housing projects are monitored via desk review and / or site-visits, including 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
Staff inspects 15% - 20% of the total HOME units per project, minimum one unit in each building	
10+ HOME-Assisted Units = Annual Financial Review	

On-site visits include property standards completion and ongoing compliance inspections, tenant file review, household income verification, etc. City staff also conducts 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.

Risk Assessments: Affordable housing projects are also scrutinized via routine Risk Assessment in order for City staff to evaluate the relative level of risk of noncompliance for each project in the assisted portfolio. The risk assessment includes reviewing:

- Number of units
- Staff turnover and experience
- Funding amounts, affordability periods and type of assistance provided
- File and project documentation
- Past performance

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Projects with higher risk assessment scores are prioritized for intensive case management efforts to bring the project into compliance. These projects typically undergo multiple site visits and extensive technical assistance from City staff.

First Time Home Buyers: Homebuyers receiving HOME assistance are monitored for residency requirements annually through the United States Postal Service. City staff sends a newsletter via first class mail to each assisted household. If homeowners have changed primary residency, the mail is returned to the City office. Noncompliant projects are prioritized for intervention through the City's legal office.

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 throughout applicable affordability periods. The application includes (but is 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. Staff also conducts a CHDO capacity review every time a new project is funded to ensure the organization has the ability to carry out functions of the proposed project. This fiscal year, NeighborWorks Montana and Homeword were certified as active CHDOs.

Citizen Participation Plan: Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports. *91.105(d); 91.115(d)*

As noted in the first section of this CAPER (CR-05), the public comment period for the City's CDBG and HOME CAPER exceeds the minimum 15-day requirement. A public hearing is also held before the Billings City Council at the end of the public comment period. Notice of both the public comment period and hearing are published in a local newspaper for three consecutive weeks. Public comments are noted in the first section of the CAPER.

The City's Citizen Participation Plan includes garnering input throughout annual allocation and performance reporting procedures and continuing to work with stakeholders to address needs. City staff encourages citizen participation in the consolidated planning process and makes special efforts to include low income citizens, minorities, non-English speaking persons, persons with disabilities, and female-headed households. City staff is also fully prepared to comply with Citizen Participation requirements for the development of the Assessment of Fair Housing.

Community Development Board: The City of Billings created the Community Development Board in the 1970s to ensure low income citizen participation and consultation for the use of federal funds. By City ordinance, six of the nine Board members must reside in low income areas or be designated as representatives of a low income neighborhood.

The Board meets on the first Tuesday of each month and is responsible for making recommendations to the City Council for the use of federal funds and monitoring program implementation. The Board members review drafted Consolidated Plans, Annual Action Plans and CAPERs and they annually attend Neighborhood Task Force meetings and public events to promote the City's programs.

Website Posting & Email Solicitation: The drafted CAPER was posted to the City's website and a public notice was published for three consecutive weeks to notify the public about the drafted document and the City Council's public hearing. In addition, the following organizations received emails and direct links to the CAPER to promote review and facilitate public comment. These organizations primarily serve minorities, persons with disabilities, and female-headed households. Staff encouraged the agencies to share this information with their clients and other organizations who may be interested in the drafted CAPER.

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CAPER OUTREACH		
#	**Organization**	**Services and Client Demographics**
1.	Housing Authority of Billings	The Housing Authority of Billings provides housing and services to low income families and to the homeless. The predominant population is very low income, minority and female-headed households (over 400 families). The Housing Authority also serves the elderly, disabled, minority families and the homeless.
2.	Homeword	Homeword began as a project of WORD (Women's Opportunity and Resource Development, Inc.) in 1994, in response to the growing need for affordable housing in Montana. Homeword is a housing developer and housing provider serving those working low-wage jobs, seniors on fixed incomes, people with disabilities, female-headed households, domestic violence survivors, veterans and formerly homeless people.
3.	Rimrock	Rimrock is a local housing and service provider representing persons with disabilities, minorities, and those experiencing addiction or who are in recovery.
4.	Mental Health Center	The Mental Health Center is a regional housing and service provider representing persons with disabilities, including those experiencing mental illness, addiction and / or homelessness. The Mental Health Center also serves a high number of minority clients.
5.	Family Service, Inc.	A local service provider assisting very low income families, minorities, female-headed households and those with disabilities. Services include food and clothing distribution, health supplies, vision care assistance, etc.
6.	District 7 HRDC	A regional service provider assisting low income households, female-headed households, minorities, the disabled and disadvantaged youth. Services include childcare assistance, food programs, alternative education, emergency housing assistance, employment / training opportunities, energy assistance, and housing and supportive services for young mothers.
7.	Adult Resource Alliance	A local service provider assisting elderly and disabled citizens with access to nutrition programs, socialization and volunteer opportunities, transportation and home health care services.
8.	Big Sky Senior Services	A local service provider assisting elderly and disabled citizens with access to home healthcare services and prevention of elder abuse.
9.	Living Independently for Today and Tomorrow	A local housing and service provider for the disabled. Services include independent living skills programs, personal care assistant support, peer mentoring, etc.
10.	Yellowstone AIDS Project	A housing and service provider supporting those with HIV/AIDS. Services include testing, pharmaceutical assistance, housing assistance, meal programs, transportation and access to pantries.
11.	Rocky Mountain Tribal Leader's Council	An organization dedicated to improving health, economic development and education for Tribes and their members. Services include addiction treatment / recovery and good health and wellness.
12.	YWCA Gateway House	A local housing and service provider for victims of domestic violence; primarily female-headed households and minorities. Services include housing, legal advocacy, employment / training, and case management to access mainstream benefits.
13.	Montana Migrant Council	An organization providing healthcare and dental visits to extremely low income agricultural workers and their families. The vast majority of the people served are minorities.
14.	Montana Fair Housing	A private, full-service nonprofit organization dedicated to the elimination of housing discrimination in Montana. Services provided to minorities, female-headed households, the disabled and the elderly include education, advocacy, and legal support.
15.	Montana Department of Commerce	State agency providing HUD HOME and CDBG resources to meet housing and community development needs.
16.	NeighborWorks Montana	An organization providing affordable housing opportunities for families and individuals. This organization provides housing assistance and options for low income households, minorities, female-headed households and the disabled.

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Minorities: Organizations representing minorities included in the solicitation of comments on the City's CAPER include the Housing Authority of Billings, Homeword, Rimrock, the Mental Health Center, Family Service, Inc., District 7 HRDC, Rocky Mountain Tribal Leader's Council, YWCA Gateway House, Montana Migrant Council, Montana Fair Housing, and NeighborWorks Montana.

Female-Headed Households: Organizations representing female-headed households included in the solicitation of comments on the City's CAPER include the Housing Authority of Billings, Homeword, Family Service, Inc., District 7 HRDC, YWCA Gateway House, Montana Fair Housing, and NeighborWorks Montana.

Disabled Citizens: Organizations representing the disabled included in the solicitation of comments on the City's CAPER include the Housing Authority of Billings, Homeword, Rimrock, the Mental Health Center, Family Service, Inc., District 7 HRDC, Adult Resource Alliance, Big Sky Senior Services, Living Independently for Today and Tomorrow, Yellowstone AIDS Project, Montana Fair Housing, and NeighborWorks Montana.

The City's procedure is to utilize Montana's Relay (TTY 711) system to communicate with persons with hearing and / or speech impairment and places the TTY 711 number in public notices, program brochures and other documents utilized for public communication. Montana Relay makes it possible to make phone calls between a standard telephone and a text telephone. After calling 711, an operator translates between the calling parties, speaking aloud whatever is typed, so the standard phone user can hear it. The operator also types whatever is said so the text telephone user can read it.

Non-English Speaking Citizens: The City contains a very small percentage of non-English speaking citizens; less than four percent of the City's total population. At this level, the City does not meet the five percent or 1,000 people threshold utilized to determine the need for additional language publication and accommodation. According to data derived from the 2011 Census, there are an estimated 13,040 Spanish-language speakers in the entire state of Montana; 1.4 percent of the State's population. With such a small number of individuals who are non-English speaking, City staff did not publish the public notice for the public hearing in an alternative language.

City staff has written and implemented a Language Assistance Plan to establish guidelines to ensure access to program information and further equal opportunity for persons with hearing impairment and limited English proficiency. The Language Assistance Plan states that the City of Billings Community Development Division will offer interpretation and / or translation services upon request, and whenever such services are needed; staff is responsible for contacting a vendor to schedule the earliest possible date / time for interpretation/translation services ensuring the convenience of the individual with limited English proficiency.

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CR-45 CDBG *91.520(c)*

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

The objectives set forth in the Consolidated Plan are still viable and appropriate:

- Provide direct, affordable financing and assistance to low income homeowners for the completion of needed repairs citywide.
- Revitalize low income neighborhoods through foreclosure remediation, redevelopment and infill development.
- Provide affordable financing and support to promote homeownership opportunities citywide. Provide homebuyer education to all households utilizing acquisition programs.
- Encourage the citywide development of new affordable single-family, multi-family and special needs housing in the community through private developers and nonprofit organizations.

The following objectives are still viable and appropriate, but will not be included in HUD's IDIS system as there is no separate funding source allocated to activities:

- Ensure equal opportunity and housing choice with all programs and activities citywide.
- Implement core programs citywide to promote desegregation and inclusive neighborhoods. Encourage collaboration to address needs and to respond to opportunities for special needs populations.

This fiscal year, staff has not identified reasons for changes to the First Time Home Buyer, Affordable Housing Development, or Foreclosure Acquisition / Rehabilitation programs. The Housing Rehabilitation and Manufactured Home Repair Loan programs are currently under staff review. There has been low demand for the programs in the last few years.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

The City of Billings - Community Development Division does not have an open BEDI grant.

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CR-50 HOME *91.520(d)*

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

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

City staff conducts annual reviews of affordable rental housing projects funded through the HOME program throughout the affordability period. HOME-funded projects requiring on-site inspections this year included: Grandview apartments (Accessible Space); Old Town Square apartments (Housing Authority of Billings); Southern Lights apartments (Homeword); Magic City Terrace apartments (Volunteers of America); Sage Towers apartments (Tamarack); YWCA Gateway House; and Pheasant Home apartments.

All of the issues detected during the inspection of HOME-assisted units were minor and were immediately remedied. A tenant had taken down their smoke detector in their unit due to it beeping from needing a new battery. The battery was replaced and the smoke detector was put back up. Another property needed to have the screws replaced on the handrail for the stairs as the handrail was wobbly and close to coming off the wall. One unit needed two screens replaced due to the tenant damaging the screens and removing them completely. Another unit need a bathroom light fixture replaced because it was no longer working and was the only source of light in the bathroom. All of the projects were reviewed this year and staff determined that they are being operated in compliance with HOME program regulations. Properties not meeting compliance with regulations are addressed through case-management and a targeted provisional work plan is created to bring the project into compliance.

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

The City adheres to an Affirmative Marketing Procedure to further the City's commitment to nondiscrimination and equal opportunity in housing. The intention of City staff's efforts is to attract those who are least likely to apply for housing and community development programs. City staff has assessed affirmative actions taken and believes the marketing completed for HOME units is adequate.

Affordable Housing: Proposed affordable housing development projects with more than five HOME units are required to submit an Affirmative Marketing Plan with the application for funding. Plans include 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.

Affirmative Marketing Action Plans were also reviewed during annual monitoring reviews. Organizations list the process by which they are marketing vacant units (rental offices, the local newspaper, and entrance of the project) in attempt to reach different minorities, genders, and the disabled.

Home Repair / Buyer: Presentations on these programs occur each spring at Neighborhood Task Force meetings. These communities represent low income and high-minority concentration areas in Billings. In recent fiscal years, information regarding the home repair / buyer programs and contractor opportunities have been distributed as follows:

- City staff emailed fliers to agencies serving the elderly, disabled and those experiencing homelessness including HRDC District 7, Rural Dynamics, Center for Children and Families,

DRAFT

Rimrock Foundation, Family Service, Inc., the Mental Health Center and the Community Crisis Center.

- A flyer describing the home repair programs are sent to low income homeowners previously assisted through the First Time Home Buyer program and to local lenders.
- Print advertising appeared multiple issues of ***Tidbits of Billings*** (a weekly publication).
- Printed brochures and information are continually distributed through the Billings Home Center.
- Staff manned a booth, distributed print materials, and met with participants at the "Community Resource Fair".
- Over 35,000 full-color direct mail inserts were distributed to City residents via water bills.
- Distributed printed flyers, brochures and information through the Office of Indian Education and the Indian Health Board of Billings.
- Mailed letters and a supply of brochures to all Billings mobile home parks and offered to do workshop(s) for residents on the Manufactured Home Repair Loan Program.
- Information, applications, and other information are continuously available on City of Billings' website here.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

A total of $312,534 in program income and recaptured funds was received in the HOME program this fiscal year. Funding was committed and expended this fiscal year via the First Time Home Buyer program. Remaining funds have been committed to First Time Home Buyer program and the full amount will be utilized by the committed households close on their homes this fall.

HUD requires the City of Billings to utilize program income, repaid, and recaptured revenues prior to drawing down entitlement funds. Therefore, staff reduces previously committed entitlement funds from IDIS activities and replaces it with cash revenue funds for immediate use. The Consolidated Plan stipulates that federal resources will be allocated on a close- and shovel-ready basis, ensuring the efficient use of funds in programs that are in higher demand.

A total of 69 households achieved homeownership through the First Time Home Buyer program, 30 of which were funded using HOME dollars. The average purchase price of the homes was approximately $164,000. Thirteen percent of the total households were minorities, and 40 percent were single-headed households. Four households were extremely low income and the remaining households were low income.

Describe other actions taken to foster and maintain affordable housing. *91.220(k)*

The City has been managing the following programs to foster and maintain affordable housing:

- **Affordable Housing Preservation:** Housing Rehabilitation, Manufactured Home Repair, Affordable Housing Development, and Foreclosure Acquisition / Rehabilitation.
- **New Affordable Housing Opportunities:** Community Housing Development Organizations, Affordable Housing Development, and First Time Home Buyer.
- **Housing Choice:** Fair housing education in all City programs and supporting the development of the Billings Home Center.

DRAFT

- **Poverty Impact:** The Billings Metro VISTA Project is providing support to Rebuilding Together to support affordable housing preservation.

Please Note: The priority need identified to expand housing choice is supported by administrative activities and has not been allocated separately from the above.

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PUBLIC NOTICE

CITY OF BILLINGS
FY2017-2018 COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM (CDBG)
AND
HOME INVESTMENT PARTNERSHIP PROGRAM (HOME)
COMPREHENSIVE ANNUAL PERFORMANCE EVALUATION REPORT (CAPER)

The City of Billings will hold a public hearing on the CDBG and HOME Comprehensive Annual Performance Evaluation Report (CAPER) at 5:30 pm on Monday, September 24, 2018, in the City Council Chambers at City Hall, 210 North 27th Street, Billings, MT.

The purpose of the Public Hearing is to obtain public comment on the City's performance under FY2017-2018 CDBG and HOME programs. Federal regulations require a minimum 15-day public comment period for the CAPER. The City of Billings exceeds this requirement by facilitating a public comment period beginning September 8 through September 24, 2018.

Copies of the City's drafted FY2017-2018 CDBG and HOME CAPER are available beginning September 7, 2018 for review from the Community Development office on the 6th floor of the Miller Building, 2825 3rd Avenue North, Billings, MT. The drafted CAPER, City Council agendas and minutes can also be viewed on line at www.CityofBillings.net/CDreports.

Additional information regarding the FY2017-2018 CDBG and HOME CAPER or the public hearing can be obtained by contacting the Community Development office at 406-657-8286 (Montana Relay 711), or via email at beckettb@ci.billings.mt.us.

The Public Hearing is accessible to individuals with physical disabilities. Special arrangements for participation in the public hearing by individuals with hearing, speech, or vision impairment may be made upon request at least three days prior to the hearing. FHEO. PUBLISHED on September 7th, 14th and 21st, 2018.

Denise R. Bohlman
Billings City Clerk
P. O. Box 1178
Billings, MT 59103

9/7, 9/14, 9/21 2018
MNAXLP